

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

**LARD OIL COMPANY, INC.
DENHAM SPRINGS FACILITY
914 FLORIDA BOULEVARD
DENHAM SPRINGS, LOUISIANA
LIVINGSTON PARISH**

PPM PROJECT NO. 542303.13SPCC

FEBRUARY 2013

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

FOR

**DENHAM SPRINGS FACILITY
914 FLORIDA BOULEVARD
DENHAM SPRINGS, LOUISIANA
LIVINGSTON PARISH
TOTAL STORAGE CAPACITY: 274,300 GALLONS**

PREPARED FOR:

**LARD OIL COMPANY, INC.
914 FLORIDA BOULEVARD
DENHAM SPRINGS, LOUISIANA
(225) 664-3311**

PPM PROJECT NO. 542303.13SPCC

FEBRUARY 2013

PREPARED BY:

**PPM CONSULTANTS, INC.
15556 PERKINS ROAD
BATON ROUGE, LOUISIANA 70810
(225) 293-7270**

DISTRIBUTION LIST

SPILL PREVENTION AND CONTROL PLAN

- Lard Oil Company, Inc. – Denham Springs Facility
- Mr. Fred Guedry, Environmental and Safety Coordinator
- Mr. Craig Petry, Plant Manager

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1.0 INTRODUCTION

Federal regulations promulgated on January 10, 1974 [Code of Federal Regulations, Title 40, Part 112 (40 CFR 112)] and revised on July 17, 2002, require the preparation and implementation of a Spill Prevention Control and Countermeasure (SPCC) Plan for all nontransportation-related facilities which have an aggregate storage capacity greater than 1,320 gallons, and have the potential to discharge oil or oil-related substances to the navigable waters of the United States (U.S.) or adjoining shorelines.

The SPCC rule applies to owners or operators of facilities that drill, produce, gather, store, use, process, refine, transfer, distribute, or consume oil and oil products. The new rule (July 17, 2002) clarifies applicability to owners or operators that use oil in quantities that may be harmful as described in 40 CFR Part 110. The changes also allow for tracking the scope of the rule to conform to the expanded jurisdiction of the amended Clean Water Act (CWA). Amendments to the July 17, 2002 rule were made in December 2006, December 2008, and November 2009. The December 2006 amendments became effective on February 6, 2007. The December 2008 and November 2009 amendments became effective on November 10, 2011 as summarized in the table below:

A facility, including a mobile or portable facility, starting operation...	Must...
On or before August 16, 2002	Maintain its existing SPCC Plan. Amend and implement the amended SPCC Plan no later than November 10, 2011
After August 16, 2002 through November 10, 2011	Prepare and implement an SPCC Plan no later than November 10, 2011
After November 10, 2011 (excluding production facilities)	Prepare and implement an SPCC Plan before beginning operations
After November 10, 2011 (production facilities)	Prepare and implement an SPCC Plan within six months after beginning operations.

The federal regulations contained in 40 CFR Part 112 only apply to the storage of oil or other petroleum products at facilities with an aggregate aboveground storage capacity greater than 1,320 gallons and only containers with a capacity of 55 gallons or greater are counted for the storage of oil or other petroleum products. The state regulations regarding oil spills can be found in the Louisiana Spill Prevention and Control (SPC) regulations [Louisiana Administrative Code, Title 33, Part IX (LAC 33:IX), Chapter 9] apply to facilities with minimum aboveground storage capacity of oil or regulated materials of 1,320 gallons, or a single container of 660 gallons or greater containing hazardous chemicals listed in the *Notification Regulations and Procedures for Unauthorized Discharges* published by the Louisiana Department of Environmental Quality (LDEQ). This SPCC Plan has been prepared in a manner as to satisfy the requirements of both the federal and state spill prevention regulations.

Under the SPCC regulations, facilities are required to report spills to the Environmental Protection Agency (EPA) Regional Administrator after discharging more than 1,000 U.S.

gallons of oil-related substance in a single discharge or after discharging more than 42 U.S. gallons of oil-related substance in each of two discharges within a 12 month period.

This SPCC Plan uses the federal regulations of 40 CFR Part 112 as guidance and provides a response to each applicable requirement. Figures included are **Figure 1, Site Location Map, Figure 2, Site Map, Figure 3, Containment Area No. 2 Detail, and Figure 4, Containment Area No. 3 Detail**, in **Appendix A, Figures**. **Appendix B, Tables**, contains **Table 1, Storage Tank Inventory and Testing Schedule; Table 2, Spill Response Procedure; Table 3, Potential Discharge Volumes and Direction of Flow; Table 4, Oil Product Transfer Procedures; and Table 5, Vehicle and Equipment Fueling Procedures**. **Appendix C, Emergency Notification Phone List**, provides a list of contacts to be notified in the event of a release. A list of information that should be relayed to the appropriate authorities in the event of a release is attached in **Appendix D, Release Notification Procedures and Forms**. **Appendix E, Inspection Record Forms**, provides copies of the monthly and annual inspection forms and annual SPCC Plan review form. **Appendix F, Substantial Harm Criteria Checklist**, provides a listing of questions a facility must answer to determine if their activities could directly impact the environment or waterways. Answering “yes” to any of the questions would federally require a facility to develop a Facility Response Plan that meets the requirements of the Code of Federal Regulations. **Secondary Containment Calculations, Appendix G**, includes the mathematical calculations used to estimate the capacities of the containment secondary containment and loading areas. A signed commitment of resources necessary to implement the measures described in this SPCC Plan is included as **Appendix H, Written Commitment of Manpower, Equipment, and Materials**.

The primary objective of the SPCC Plan is to provide written instructions to site personnel on how to prevent oil from reaching navigable waters of the United States. This Plan is designed to familiarize oil and hazardous material handling personnel at the facility with areas of potential spills, the procedures used to respond to a spill, and the methods and procedures used to inspect equipment so that the risk of an accidental spill is reduced.

In accordance with 40 CFR Part 112, this SPCC Plan has been approved and signed by management with the authority to commit the necessary resources to fully implement the Plan. Management approval is provided in **Section 2.0, Management Approval**.

Also, in accordance with 40 CFR Part 112, this SPCC Plan has been certified by a Registered Professional Engineer attesting to the fact that the Professional Engineer or their agent has examined the facility and is familiar with the provisions of the applicable regulations, that the Plan has been prepared in accordance with good engineering practices, including consideration of applicable industry standards, that procedures for required inspections and testing have been established, and that the Plan is adequate for the facility. Engineer certification of the Plan is provided in **Section 3.0, Registered Professional Engineer’s Certification**.

This SPCC Plan has been developed in a manner to identify the regulatory requirement cited in 40 CFR Part 112 followed by the appropriate response for this facility. For ease of

reference, efforts have been made to discuss the applicable requirements in the general order provided in 40 CFR Part 112. A cross-reference table is provided following the Table of Contents on page iv.

Complete copies of this SPCC Plan are maintained at the facility, and are made available to authorized representatives of the EPA and LDEQ for on-site review during normal working hours.

The owner/operator of the facility must document completion of review and evaluation of this Plan, and must state whether or not the Plan was amended. The SPCC Plan **Documentation of Review and Evaluation** page is included as **Section 5.0**.

2.0 MANAGEMENT APPROVAL

Lard Oil Company, Inc. – Denham Springs Facility is committed to the implementation of this SPCC Plan and the prevention of releases of oil to navigable waters of the United States and the environment. Additionally, the undersigned certifies that the necessary manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful will be provided.

Signature: _____

Name: Mr. Fred Guedry

Title: Environmental and Safety Coordinator

Date: _____

3.0 REGISTERED PROFESSIONAL ENGINEER'S CERTIFICATION

The undersigned Registered Professional Engineer is familiar with the requirements of Part 112 of Title 40 of the *Code of Federal Regulations* (40 CFR 112) and Louisiana Administrative Code Title 33, Part IX, Subpart 1, Chapter 9 (LAC 33:IX, Chapter 9) and has visited and examined the facility, or has supervised examination of the facility by an appropriately qualified personnel.

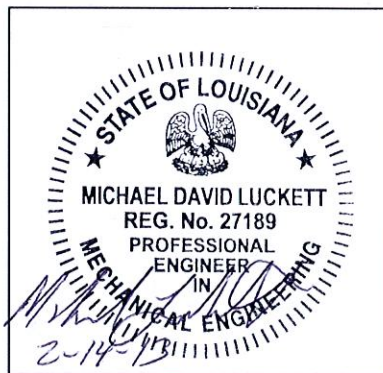
The undersigned Registered Professional Engineer attests that this Spill Prevention, Control, and Countermeasure (SPCC) Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards and the requirements of 40 CFR 112; the procedures for required inspection and testing have been established; and that this Plan is adequate for the facility [40 CFR 112.3(d)]. This certification in no way relieves the owner or operator of the facility of their duty to prepare and fully implement this SPCC Plan in accordance with the requirements of 40 CFR 112 and LAC 33:IX, Chapter 9. This Plan is valid only to the extent that the facility owner or operator maintains, tests, and inspects equipment, containment, and other devices as prescribed in the Plan.

This engineer nor his agent did not test for proper operation of any electrical/mechanical/safety equipment, overfill devices, vents, emergency venting, valves, corrosion control systems, and any other equipment systems not specifically mentioned.

(P.E. SEAL)

Signature:

Date:



Name: Michael D. Luckett, P.E.

Registration No.: 27189

State: Louisiana

Title: Senior Engineer

Company: PPM Consultants, Inc.

4.0 LOCATION OF SPCC PLAN

In accordance with 40 CFR 112.3(e), a complete copy of this SPCC is maintained at the Lard Oil Company, Inc. office, located at 914 Florida Avenue, Denham Springs, Louisiana 70726.

5.0 DOCUMENTATION OF REVIEW AND EVALUATION

Title 40 of the CFR Part 112.5(c) states, “Except as provided in §112.6, have a Professional Engineer certify any technical amendments to your Plan in accordance with §112.3(d).” This SPCC Plan undergoes an administrative review at a minimum of every five years and is technically reviewed and amended by a Professional Engineer whenever there is a modification in facility design, construction, storage capacity, operation, or maintenance, which renders the Plan inadequate.

Date	Page	Nature of Change	Authorized Signature:
July 2005	Full Plan	Initial Plan Preparation	
December 2008	Full Plan	SPCC Plan Update	
February 2013	Full Plan	SPCC Plan Update	

6.0 GENERAL REQUIREMENTS

6.1 FACILITY CONFORMANCE – 40 CFR 112.7(a)(1)

Include a discussion of your facility’s conformance with the requirements listed in this part:

This Plan has been developed for Lard Oil Company, Inc. – Denham Springs Facility to ensure that, when properly implemented and maintained, the facility will be in conformance with the applicable requirements established in 40 CFR Part 112 and LAC 33: IX, Chapter 9.

This Plan has the full approval of management at a level of authority to commit resources necessary to fully implement the Plan. The designated person responsible for the day-to-day administration of the SPCC Plan and all discharge prevention activities at the facility is Mr. Fred Guedry, Environmental and Safety Coordinator.

6.2 DEVIATIONS – 40 CFR 112.7(a)(2)

Provide an explanation of any non-conformance from the requirements of the regulations, and where applicable describe in detail alternate methods and how you will achieve equivalent environmental protection – 40 CFR 112.7(a)(2):

No deviations from the regulations were required since this Plan adheres to all applicable requirements of 40 CFR Part 112.

6.3 FACILITY DESCRIPTION – 40 CFR 112.7(a)(3)

Describe in your Plan the physical layout of the facility and include a facility diagram that provides the location and contents of each fixed oil storage container and the storage area where mobile or portable containers are located – 40 CFR 112.7(a)(3):

Facility Name:	Denham Springs Facility Denham Springs, Louisiana
Operator:	Lard Oil Company, Inc.
Date of Initial Operation:	1956
Mailing Address:	914 Florida Boulevard Denham Springs, Louisiana 70726
Type & Size:	Bulk Oil and Petroleum Storage Facility – approximately 2.6 acres
NAICS Code:	5171 – Petroleum bulk stations and terminals
Facility Location:	Livingston Parish

Facility Concerns: Oil Storage and equipment loading/unloading associated with bulk terminal operations.

The Denham Springs Facility is located in Denham Springs, Louisiana. Geographically, the facility is located in Section 59, Township 6 South, Range 2 East of the Denham Springs, Louisiana United States Geological Survey (USGS) topographic map. Aqua Marine, a boat retailer, and undeveloped property are located west northwest of the site across Highway 190 (Florida Boulevard). Residencies are located south and southeast of the facility. Pizza Hut is located northeast of the site. A retail gasoline station is located southwest of the facility. The facility is located at latitude 30° 28' 33" North and longitude 90° 57' 37" West. A map showing the geographic location of the Denham Springs Facility is included as **Figure 1, Site Location Map, in Appendix A, Figures.**

Description of facility including an indication of the nearest potential receiving waters:

The Denham Springs Facility is an active fueling facility. Pertinent site structures at the site include an office, three storage buildings, a loading rack, and two bulk storage tank areas. Aboveground storage tanks (ASTs) are located within two secondary containment areas. Containment Area No. 1 contains one 20,000-gallon vertical unleaded gasoline tank, one 20,000-gallon vertical diesel tank, one 10,000-gallon vertical diesel tank, two 10,000-gallon vertical gasoline tanks, and one 4,000-gallon vertical kerosene tank. Containment Area No. 2 contains nine 3,000-gallon vertical lube oil tanks, nineteen 6,500-gallon vertical lube oil tanks, one 1,000-gallon horizontal double-walled waste oil tank, and one 8000-gallon vertical lube oil tank. An underground storage tank (UST) is also present at the Denham Springs Facility. The UST is a 10,000-gallon tank containing Varsol. The facility layout is shown as **Figure 2, Site Map, in Appendix A, Figures.**

The nearest potential receiving water is the Amite River, which is located approximately 0.8 miles west of the site, as shown in **Figure 1, Appendix A.**

6.3.1 Oil Storage and Capacity

The type of oil in each fixed container and its storage capacity. For mobile or portable containers, either provide the type of oil and storage capacity for each container or provide an estimate of the potential number of mobile or portable containers, the types of oil, and anticipated storage capacities - 112.7(a)(3)(i):

On-site ASTs storing gasoline, diesel fuel, lube oil, and kerosene are located within two containment basins. One 1,000-gallon, double-walled used oil tank is located along the northwestern side of Containment Area No. 2. AST sizes range from 20,000 gallons to 1,000 gallons. Multiple pails, totes, and drums ranging from 5 to 330 gallons along with various boxed oil/petroleum products are located within the warehouses.

A diagram depicting AST locations is included as **Figure 2, Appendix A.** Tank sizes, identification, materials stored, inspection and testing requirements, and containment

volumes are provided in **Table 1, Storage Tank Inventory and Testing Schedule**, in **Appendix B, Tables**.

6.3.2 Oil Handling and Transfer

Discharge prevention measures including procedures for routine handling of products (loading, unloading, and facility transfers, etc.) – 112.7(a)(3)(ii):

Discharge prevention measures at the Denham Springs Facility include AST containment areas, active and passive containment, training of appropriate personnel in the operation and maintenance of equipment to prevent and contain spills, and annual discharge prevention briefings to ensure understanding of the SPCC Plan for the facility. Additional discharge prevention measures include inspection of tanks, piping, secondary containment, and drainage controls; and measures to prevent discharge during loading and unloading operations. These prevention measures are discussed in more detail throughout the SPCC Plan.

6.3.3 Spill Controls

Discharge or drainage controls such as secondary containment around containers and other structures, equipment, and procedures for the control of a discharge – 112.7(a)(3)(iii):

Spill control is managed by the Denham Springs Facility by utilizing spill control devices and spill prevention and countermeasure procedures, such as:

- Secondary containment structures.
- Sumps and collection system.
- Overfill Protection.
- Leak detection devices.
- Drip pans and buckets.
- Spill response materials.
- Visual inspections.
- Integrity testing.
- Commitment of manpower.

The following sections describe these measures in greater detail.

6.3.3.1 Secondary Containment Structures

The facility is equipped with proper containment systems and equipment to contain and control a discharge in order to limit the threat of harm to human health and the environment. The secondary containment discharge valves are closed and locked except when performing manned discharges as described below.

In the event of a release of products from an AST, adequate containment is provided. For the subject site, there exist three secondary containment areas. For Containment Area No. 1, based on the largest container of 20,000 gallons, a 1,911 square foot concrete wall, approximately 3 feet high at the low point elevation, surrounds the ASTs, which is sufficient to contain 154 percent of the volume of the largest AST. The net capacity of Containment Area No. 1 is 33,950 gallons. For Containment Area No. 2, based on the largest container of 8,000 gallons, a 3,982 square foot concrete wall, approximately 1.1 feet high at the low point elevation, surrounds the ASTs, which is sufficient to contain 253 percent of the volume of the largest AST. The net capacity of Containment Area No. 2 is 22,231 gallons. For Containment Area No. 3, based on the largest container of 1,500 gallons, a 1,943 square foot concrete curb, wall, and rollover berms with a uniform depth of 4 inches surrounds the loading rack area, which is sufficient to contain 294 percent of the volume of the largest tank. The net capacity of Containment Area No. 3 is 4,844 gallons.

Secondary Containment Areas No. 1 and No. 2 utilize manually operated containment discharge valves for release of accumulated precipitation. After inspection for any signs of sheen or release from the ASTs, accumulated precipitation from Containment Area No. 1 and/or No. 2 will be discharged and logged on the **Secondary Containment Drainage Form** in **Appendix E** following each rain event.

Secondary containment calculations are provided in **Appendix G, Secondary Containment Calculations**. A listing of all facility ASTs and associated net containment capacities is given in **Table 1, Storage Tank Inventory and Testing Schedule**, in **Appendix B, Tables**.

6.3.3.2 Overfill Protection

Each AST is monitored with a direct-vision level gauge, used to determine the liquid level, and a smart tank monitor, which is observed remotely in the facility control room. In addition, a drop stick is used to verify the liquid level once per month.

6.3.3.3 Oil Water Separator

The Denham Springs Facility utilizes an underground oil water separator as part of Containment Area No. 3. Water and other liquids drain from the containment area into a sump containing the oil water separator. Once the oil and water have been separated, the water is pumped into Containment Area No. 1. Water inside Containment Area No. 1 is released to the facility's drainage system if no sheen or oil residue is observed. If a sheen or oil residue is observed, the facility contracts a vacuum truck to remove the liquid in Containment Area No. 1 and all liquid in the sump for the oil water separator.

6.3.3.4 Drip Pans and Buckets

Drips and small spills may occur due to malfunctioning equipment, overfill, improperly connected or malfunctioning couplings at the vehicle or fill ports, fittings, valves, or from

portable containers that are brought to the site. If portable equipment or containers are stored at the site overnight or if a leak is observed during daily inspections, then drip pans or buckets will be placed to temporarily contain the leak. At the truck loading area, the end of the load line is equipped with a load line drip bucket designed to prevent small discharges that may occur when disconnecting the hose.

Any spills in these areas or any location on the site will be contained using adsorbent booms and pads until the spill area can be cleaned up and properly drummed for eventual disposal at a permitted facility by the contractor. Waste manifests shall be provided, completed, and signed.

6.3.3.5 Spill Response Materials

In addition to the aforementioned secondary containment areas, booms, sorbents, shovels, and other discharge response materials are stored in key locations of the facility and on all trucks. This material is sufficient to contain small discharges, and contains the following:

Spill Kits
48" Absorbent Socks
10' Absorbent Socks
15" x 20" Absorbent Pads
Absorbent Pillows
Absorbent Wipes
Disposal Bags and Liners
Salvage Drums
Fire Extinguishers, Portable
PPE (Hard Hats, Ear Plugs, Safety Glasses, Nomex, Tyvex, Cotton and Nitrile Gloves, Rain Suits, Waders, Life Jackets, Traffic Vests)
Traffic Warning Signs and Flags

6.3.3.6 Visual Inspections

The Denham Springs Facility inspection program is comprised of informal daily examinations, monthly and annual scheduled inspections, and periodic condition inspections. Additional inspections and/or examinations are performed whenever an operation alert, malfunction, shell or deck leak, or potential bottom leak is reported following a scheduled examination. Written examination/inspection procedures and monthly and annual examination/inspection reports are signed by the field inspector and are maintained at the field office for a period of at least three years. A detailed inspection procedure is discussed in **Section 6.9, Inspections, Tests, and Records**, of this Plan.

6.3.3.7 Integrity Testing

The integrity testing schedule of all oil storage tanks at the site is determined based on STI SP-001, as discussed in **Section 6.9.4, Integrity Inspection and Testing**. A pipe

inspection and testing program is specifically implemented in accordance with American Petroleum Institute (API) 570 and 574 to monitor the integrity of the piping system and is discussed further in **Section 6.9.5, Pipe Inspection**.

6.3.3.8 Commitment of Manpower

A written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful is provided in **Appendix G, Written Commitment of Manpower, Equipment, and Materials**.

6.3.4 Spill Mitigation Procedures

Countermeasures for discharge discovery, response, and cleanup (both the facility's capability and those that might be required of a contractor) – 112.7(a)(3)(iv):

In the event of a spill at the Denham Springs Facility, facility personnel will act to immediately eliminate the source, contain the spill, and minimize and control the quantity spilled. Secondary containment is designed to provide adequate containment and the drainage systems are engineered so that spills occurring within the facility will be contained within the facility property. Necessary equipment and spill cleanup materials are located on-site. If warranted by the magnitude of the release, facility personnel will contact their designated emergency response contractor for further containment of the spill and cleanup. Appropriate authorities shall also be contacted, as the situation requires. A list of emergency numbers and Release Notification Forms are included in **Appendix C** and **Appendix D** of this Plan.

Petroleum products will not be allowed lengthy accumulation periods within the secondary containment area. Visual inspections for accumulation of fluids in the secondary containment will occur immediately after each rain event, during fueling, during off-loading of fuel, and on a monthly basis. Any accumulation of petroleum product is to be removed within 72 hours of discovery.

The following is a summary of actions that must be taken in the event of a discharge. It summarizes the distribution of responsibilities among individuals and describes procedures to follow in the event of a discharge.

In the event of a discharge, the contractor's field personnel or the Environmental and Safety Coordinator shall be responsible for the following mitigation tasks:

- Shutoff Ignition Sources
- Stop Oil Flow
- Contain the Spill

6.3.4.1 Shutoff Ignition Sources

If safe to do so, facility personnel should shut off all ignition sources, including motors, electrical circuits, and open flames.

6.3.4.2 Stop Oil Flow

Facility personnel should determine the source of the discharge, and if safe to do so, immediately shut off the source of the discharge and repair leaks from tanks, piping, or valves upon discovery.

6.3.4.3 Contain the Spill

Initial response to a release from the ASTs will be handled by facility personnel under the direction of the Environmental and Safety Coordinator. Small accumulations are to be removed with absorbent material. Large accumulations are to be removed with a portable pump or vacuum by a licensed contractor and disposed off-site in accordance with local, state, and federal regulations. Waste manifests shall be provided, completed, and signed by the contractor.

Should secondary containment fail, steps must be taken to contain the spill in the smallest possible area and prevent product from entering a body of water or leaving the facility property. Shovels may be used to construct earthen berms in the pathway of the spill. Booms and other absorbent material may be used for spill containment. Spill containment materials such as oil dry/vermiculite, drip pads, sand bags, and shovels are stored on-site for spill response.

In the event that the required response efforts exceed the capabilities of facility personnel, the emergency response contractor listed in **Appendix C, Emergency Notification Phone List**, will be contacted.

6.3.5 Disposal Procedures

Methods of disposal of recovered materials in accordance with applicable legal requirements – 112.7(a)(3)(v):

Recovered material will be properly containerized in appropriately labeled drums or other suitable containment vessels with adequate secondary containment and stored away from electrical, fire and transportation areas until disposal is arranged. Recovered product that cannot be used will be disposed of in accordance with local, state and federal regulations. Spent absorbent material and booms will be placed in appropriately labeled drums, properly manifested and disposed of in accordance with local, state and federal regulations. Contaminated soil will be contained on-site, covered with polyethylene sheeting, and disposed of in accordance with local, state and federal regulations.

All facility personnel handling hazardous wastes must have received both the initial 40-hour and annual 8-hour refresher training in the Hazardous Waste Operations and Emergency Response Standard (HAZWOPER) of the Occupational Health and Safety Administration (OSHA). This training is included as part of the initial training received by all field personnel. Training records and certificates are kept at the field office.

6.3.6 Contact List for Spill Notification

Contact list and phone numbers for the facility response coordinator, National Response Center, cleanup contractors with whom you have an agreement for response, and all appropriate Federal, State, and local agencies who must be contacted in case of a discharge as described in §112.1(b) – 112.7(a)(3)(vi):

The emergency contact list is provided in **Appendix C, Emergency Notification Phone List**.

6.4 RELEASE NOTIFICATION PROCEDURE – 40 CFR 112.7(a)(4)

Unless you have submitted a response plan under 40 CFR 112.20, provide information and procedures in your Plan to enable a person reporting a discharge as described in 40 CFR 112.1(b) to relate information on the exact address or location and phone number of the facility; the date and time of the discharge; the type of material discharged; estimates of the total quantity discharged; estimates of the quantity discharge as described in 40 CFR 112.1(b); the source of the discharge; a description of all affected media; the cause of the discharge; any damages or injuries caused by the discharge; actions being used to stop, remove, and mitigate the effects of the discharge; whether an evacuation may be needed; and the names of individuals and/or organizations who have been contacted:

In the event of a release, the Denham Springs Facility Environmental and Safety Coordinator or his designee will investigate the situation immediately and determine if the quantity of oil or hazardous material is adversely affecting public health and welfare or is of sufficient magnitude to be considered a safety hazard and/or pollution problem. If so, site personnel will take immediate action in accordance with this SPCC Plan. A **Spill Response Procedure** is included as **Table 2 in Appendix B, Tables**. Additionally, a release notification form, similar to the one provided in **Appendix D**, will be completed by the Environmental and Safety Coordinator or his designee and relayed to the appropriate authorities.

Appendix D provides a listing of the agencies that must be notified in the event of a release, a listing of the reportable quantities (RQ), and the verbal and written requirements for each agency based on the circumstances of the release.

6.4.1 Verbal Notification

Any unauthorized discharge into air, land or water must be reported immediately to the State Police and the Emergency Planning Commission as soon as the discharge is detected.

For any discharge that reaches navigable waters, or threatens to reach navigable waters, *immediate* notification must be made to the National Response Center Hotline (800-424-8802) and to the EPA.

In the event of a discharge that threatens to result in an emergency condition, facility field personnel must verbally notify the Louisiana Emergency Hazardous Materials Hotline (225-925-6595) immediately, and in no case later than *within one (1) hour* of the discovery of the discharge. An emergency condition is any condition that could reasonably be expected to endanger the health and safety of the public; cause significant adverse impact to the land, water, or air environment; or cause severe damage to property. This notification must be made regardless of the amount of the discharge.

In the event of a discharge that does not present an emergency situation, verbal notification must be made to the Office of Environmental Compliance (by telephone at 225-763-3908 during office hours or 225-342-1234 after hours, weekends, and holidays; or by e-mail utilizing the Incident Report Form and procedures found at www.deq.state.la.us/surveillance) *within twenty-four (24) hours* of the discovery of the discharge.

The RQ for hazardous substances shall be defined as follows:

- Spills or discharges onto land - the quantity designated as the Final RQ in Table 302.4 in 40 CFR §302.4.
- Spills or discharges into waters of the state - the quantity designated as the Final RQ in Table 302.4 in 40 CFR §302.4, except where the Final RQ is greater than 100 pounds in which case the RQ shall be 100 pounds.

6.4.2 Written Notification

For any discharge reported verbally, a written notification must also be sent to the LDEQ and to the Livingston Parish Local Emergency Planning Committee (LEPC), both within five (5) working days of the qualifying discharge.

A written notification to the State Emergency Response Commission or LEPC is required for a discharge of 100-lbs or more beyond the confines of the facility within seven (7) calendar days of the qualifying discharge.

Copies of spill reports prepared for other governmental agencies shall satisfy this requirement if they contain, or are supplemented to contain, all the information required by this section. The notification shall contain:

- The name, address, and telephone number of the person making the telephone report.
- The names, addresses, and telephone numbers of the responsible person and the contact person at the location of the discharge or spill, if different than previous item.
- The date, time, and location of the spill or discharge.
- A specific description or identification of the oil, petroleum product, hazardous substances, or other substances discharged or spilled.
- An estimate of the quantity discharged or spilled.
- The duration of the incident.
- The name of the surface water or a description of the waters in the state affected or threatened by the discharge or spill.
- The source of the discharge or spill.
- A description of the extent of actual or potential water pollution or harmful impacts to the environment and an identification of any environmentally sensitive areas or natural resources at risk.
- A description of any actions that have been taken, are being taken, and will be taken to contain and respond to the discharge or spill.
- Any known or anticipated health risks.
- The identity of any governmental representatives, including local authorities or third parties, responding to the discharge or spill.

In accordance with §112.4(a), whenever the facility has discharged more than 1,000 U.S. gallons of oil in a single discharge as described in §112.1(b), or discharged more than 42 U.S. gallons of oil in each of two discharges as described in §112.1(b), occurring within any twelve month period, personnel will submit the following information to the Regional Administrator within 60 days from the time the facility becomes subject to this section:

A written notification will be made to EPA for any single discharge of oil to navigable waters or adjoining shoreline waterway of more than 1,000 gallons, or for two discharges of 1-bbl (42 gallons) of oil to a waterway in any 12-month period. This written notification must be made within 60 days of the qualifying discharge, and a copy will be sent to the LDEQ and LEPC, which is the state agency in charge of oil pollution control activities. This reporting requirement is separate and in addition to reporting under 40 CFR part 110 discussed in **Section 6.4.1**. The required information is described in **Appendix D** of this SPCC Plan, and listed below:

- Name of the facility;
- Name of the person reporting the discharge;
- Location of the facility;

- Maximum storage or handling capacity of the facility and normal daily throughput;
- Corrective action and countermeasures taken, including a description of equipment repairs and replacements;
- An adequate description of the facility, including maps, flow diagrams, and topographical maps, as necessary;
- The cause of such discharge as described in §112.1(b), including a failure analysis of the system or subsystem in which the failure occurred;
- Additional preventive measures taken or contemplated to minimize the possibility of recurrence; and
- Such other information as the Regional Administrator may reasonably require pertinent to the Plan or discharge.

6.5 RELEASE CONTAINMENT PROCEDURE – 40 CFR 112.7(a)(5)

Unless you have submitted a response plan under 112.20, organize portions of the Plan describing procedures you will use when a discharge occurs in a way that will make them readily usable in an emergency, and include appropriate supporting material as appendices:

Information provided in **Sections 6.3 and 6.4** of this SPCC Plan outline the procedures to be implemented should a discharge occur. Immediate actions to be taken following a release are outlined in the **Spill Response Procedure** flowchart in **Table 2, Appendix B**. The **Spill Response Procedure** including the emergency notification phone numbers is also prominently displayed near the fuel dispensing area at the tank storage area. The SPCC Plan for the site is maintained at the Denham Springs Facility and is accessible to all facility personnel.

6.6 POTENTIAL DISCHARGE DUE TO EQUIPMENT FAILURE – 40 CFR 112.7(b)

Prediction of the direction, rate of flow, and total quantity of applicable substances which could be discharged from the facility where experience indicates a reasonable potential for equipment failure and/or human error:

Table 3, Potential Discharge Volumes and Direction of Flow, provided in **Appendix B, Tables**, summarizes potential oil discharge scenarios. If unimpeded, oil would follow site topography and reach the Amite River.

6.7 SECONDARY CONTAINMENT AND/OR DIVERSIONARY STRUCTURES – 40 CFR 112.7(c)

Provide appropriate containment and/or diversionary structures or equipment to prevent a discharge as described in §112.1(b), except as provided in paragraph (k) of this section for qualified oil-filled operational equipment, and except as provided in

§112.9(d)(3) for flowlines and intra-facility gathering lines at an oil production facility. The entire containment system, including walls and floor, must be capable of containing oil and must be constructed so that any discharge from a primary containment system, such as a tank, will not escape the containment system before cleanup occurs. In determining the method, design, and capacity for secondary containment, you need only to address the typical failure mode, and the most likely quantity of oil that would be discharged. Secondary containment may be either active or passive in design. At a minimum, you must use one of the following prevention systems or its equivalent:

The facility is equipped with proper containment systems and equipment to contain and control a discharge in order to limit the threat of harm to human health and the environment.

Used by Facility:

Yes	No	Prevention System
X		Dikes, berms, or retaining walls sufficiently impervious to contain oil
	X	Double-walled tanks with proper spill prevention and control
X		Curbing or drip pans
X		Sumps and collection systems
X		Culverts, gutters, or other drainage systems
X		Weirs, booms, or other barriers
	X	Spill diversion ponds
	X	Retention ponds
X		Sorbent materials

6.7.1 Storage Tank Area

Secondary containment areas surround each AST at the facility. The containment provides sufficient capacity to contain the volume of the largest AST located in the basin plus freeboard for precipitation.

6.7.2 Loading and Unloading Area

Discharges may occur in loading/unloading areas due to malfunctioning equipment, overfill, and improperly connected or malfunctioning couplings at the vehicle or fill ports. Spills from loading/unloading activities occurring outside the AST containment area will be responded to using absorbent materials. Spill kits containing absorbent materials will be provided in the fueling area.

6.7.3 Warehouse Areas

Portable containers (5-gallon pails, 55-gallon drums, and 330-gallon totes) are stored in facility warehouses. The floors of the warehouses are constructed of poured concrete. Discharges may occur from these containers due to malfunctioning equipment or damage

to the containers. Spill kits containing absorbent materials are provided in the warehouse areas. Monitoring records are not required.

6.8 PRACTICABILITY OF SECONDARY CONTAINMENT – 40 CFR 112.7(d)

If your Plan requires Professional Engineer certification, and it is determined that it is not practical to install any of the structures or pieces of equipment listed in paragraphs (c) and (h)(1) of this section, and §§112.8(c)(2), 112.8(c)(11), 112.9(c)(2), 112.10(c), 112.12(c)(2), and 112.12(c)(11) to prevent a discharge as described in §112.1(b), you must clearly explain in your Plan why such measures are not practicable; for bulk storage containers, conduct both periodic integrity testing of the containers and periodic integrity and leak testing of the valves and piping; and Unless you have submitted a response plan under 112.20, provide in your Plan the following:

- (1) An oil spill contingency plan following the provisions of 40 CFR Part 109.**
- (2) A written commitment of the manpower, equipment, and materials required to ensure timely and effective action to minimize damage resulting from a spill event.**

Not required for this facility.

6.9 INSPECTION, TESTS, AND RECORDS – 40 CFR 112.7(e)

Conduct inspections and tests required by this part in accordance with written procedures that you or the certifying engineer develop for the facility. You must keep these written procedures and a record of the inspections and tests, signed by the appropriate supervisor or inspector, with the SPCC Plan for a period of three years. Records of inspections and tests kept under usual and customary business practices will suffice for purposes of this paragraph:

6.9.1 Daily Inspections

During normal daily operations, facility personnel shall conduct daily visual inspections of the facility tanks, piping, pumps, secondary containment areas, and loading/unloading areas. All malfunctions, improper operation of equipment, evidence of leakage, stained or discolored soil, etc. are immediately addressed. The following table provides a scope of daily inspections:

Item	Observations
Tanks	<ol style="list-style-type: none">1. Tank liquid level gauged2. Drip marks, leaks from weld seams, base of tank3. Puddles containing spilled or leaked material4. Corrosion, especially at base (pitting, flaking)5. Cracks in metal6. Excessive soil or vegetation buildup against base

Item	Observations
Secondary Containment	<ol style="list-style-type: none"> 1. Cracks 2. Puddles containing spilled or leaked material 3. Settling 4. Gaps at base
Piping and pump	<ol style="list-style-type: none"> 1. Evidence of leaks, especially at connections/collars 2. Corrosion (pitting, flaking) 3. Settling 4. Evidence of stored material see page from valves or seals

6.9.2 Monthly Inspections

Formal inspections shall be conducted on a monthly basis. ASTs, tank lines, valves, and loading/unloading areas shall be inspected for leaks, corrosion, pitting, cracking, and deterioration of foundation/supports. Open pipes shall be capped when not in use. AST loading/unloading activities shall be performed by licensed bulk fuel transporters. The loading/unloading areas shall be inspected for spills prior to arrival and after departure of transport vehicles. Spill kits are inspected and any items used, damaged, or out of date are reordered. Inspection report forms are signed and dated by the inspector and kept on file at the facility for a minimum of three years from the date of completion. A monthly inspection log is attached in **Appendix E, Inspection Record Forms**.

6.9.3 Annual Inspections

A more comprehensive inspection is conducted on an annual basis. Each tank is inspected for paint damage, buckling or dents, corrosion, tank vents are inspected, liquid level gauges are tested, overfill protection devices are tested, the electrical system is inspected and tested, and safety devices are checked. Inspection report forms are signed and dated by the inspector and kept on file at the facility for a minimum of three years from the date of completion. An annual inspection log is attached in **Appendix E, Inspection Record Forms**.

6.9.4 Integrity Inspection and Testing

The integrity testing schedule of all ASTs at the site is determined based on STI Standard SP-001. STI Standard SP-001 defines the following categories for an AST facility:

- Category 1 – ASTs with spill control and with continuous release detection method (CRDM)
- Category 2 – ASTs with spill control and without continuous CRDM
- Category 3 – ASTs without spill control and without CRDM

All ASTs at the site are considered to be contained in a Category 1 containment. Therefore, the inspection schedule shall be in accordance with Table 5.5 of the STI Standard SP-001 as summarized below:

AST Capacity (gal)	Inspection Type	Category 1 Frequency
0 – 1,100	Periodic ¹	Monthly
1,101 – 5,000	Periodic ¹	Monthly
	External ²	Not Required
	Leak Test	Not Required
5,001 – 30,000	Periodic ¹	Monthly
	External ²	Every 20 Years
	Leak Test	Not Required

¹ *Inspection forms provided in Appendix E should be used for periodic inspections.*

² *External Inspection by a certified inspector.*

The next scheduled external inspections are documented in **Appendix B, Table 1**.

The results are to be kept on file as long as the tank(s) are in use at the facility. If a tank is taken out of service, then the records must be kept on file for a minimum of three years after the tank is taken out of service.

While performing normal facility operations, personnel will regularly conduct periodic visual inspections of all aboveground tanks, piping, and secondary containments. Formal written inspections shall be conducted on a monthly basis. Potential structural failures, housekeeping problems, and general tank conditions shall be reported and promptly corrected as a result of the inspections.

In accordance with the above table, each tank will be periodically inspected by the owner or the owner's representative. Instructions for tank inspections are provided in **Appendix E, Inspection Record Forms**. The results of the inspections must be recorded on the form provided in **Appendix E**, and kept on file for a period of five years.

During the monthly inspections, each tank, including tank foundation and supports, are inspected for deterioration and maintenance needs. A condition inspection of bulk storage containers is performed by a qualified inspector according to the schedule and scope specified in STI SP-001. Written inspections shall be performed using the inspection forms provided in **Appendix E**. The inspection forms shall be signed and dated by the inspector and kept on file at the facility for a minimum of three years.

6.9.5 Pipe Inspection

The production piping system is inspected in accordance with *API 574, Inspection Practices for Piping System Components*. The primary purposes of inspection are to identify active deterioration mechanisms and to specify repair, replacement, or more frequent inspections for the affected piping.

Areas of deterioration in the piping system that should be carefully inspected include the following:

- Pipe supports
- Elbows
- Valves
- Flanges
- Welds
- Deadlegs
- Soil-Air interface
- Areas of corrosion
- Low points of insulation
- Injections and/or mixing points
- Pressure relief valves
- Sags or areas of negative slope
- Connection points where two different types of metal are used

If the piping is repaired, replaced, or relocated, a pressure test will be performed before placing the piping system back into service. All inspection and testing records will be kept on file for a period of three years.

6.9.5.1 Aboveground Piping

External visual inspections are performed to determine the external condition of piping, insulation system, painting and coating, associated hardware, and to check for signs of misalignment, vibration, damage, corrosion, and leakage.

If piping show signs of pitting, cracking, corrosion, or wear, then it should be inspected and certified by a trained STI SP-001 inspector. An ultrasonic instrument will be used to determine the thickness of piping in locations that shows signs of deterioration. These areas should be properly tagged or numbered, noted, inspected, and thickness tested on a regular basis to determine the rate of deterioration. Keep a historic photo file on these affected areas as a visual history of deterioration.

The purpose of inspecting the piping system and the pipe components is to reveal integrity problems before they result in a catastrophic release of product to the environment. Visual inspections are conducted in accordance with **Sections 6.9.1, 6.9.2, and 6.9.3**, and if at any time, one of these inspections suggests a possible integrity concern, piping may require a pressure or thickness test to be conducted. The minimum inspection interval for above ground piping system shall be in accordance with the following table:

Situation	Visual	Pressure Test	Thickness Test
Newly installed, repaired, replaced, re-routed, or change of service	Before operation	Before operation	NR
Normal operations	Monthly	10 years	10 years

Situation	Visual	Pressure Test	Thickness Test
Pressure relieving devices	Monthly	Annually	NR
Visual inspections reveal corrosion	Daily	Annually	Annually
Visual inspection reveals crack or leak	Daily	Immediately	NR

NR – Not Required

6.9.6 Oil Water Separator Inspection

The oil water separator should be inspected after each rainfall event, monthly, and annually. Check the level of oil and sludge in the oil water separator. Also, check the effluent for a sheen. If during inspection there is more than 4 inches of sludge in the bottom, or more than 2 inches of free phase product floating on top of the water, or a sheen in the effluent, use a vacuum truck and pressure washer to clean out the oil water separator.

After cleaning out the oil water separator and before placing back into operation, fill the tank up with clean water. Make sure the effluent line is not stopped up and the oil water separator is free flowing.

Keep a record of each time that you clean the oil water separator out, and retain these records along with a service ticket and/or waste manifest to show that you have properly disposed of the waste.

6.10 PERSONNEL TRAINING AND DISCHARGE PREVENTION PROCEDURES – 40 CFR 112.7(f)

At a minimum, train your oil-handling personnel in the operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and the contents of the facility SPCC Plan 112.7(f)(1):

The Denham Springs Facility Environmental and Safety Coordinator is responsible for oil spill prevention, training, inspections, recordkeeping, and discharge notifications at this facility. All facility personnel and truck drivers receive training on proper handling of oil products and procedures to respond to oil discharge. The training ensures that all facility personnel understand the procedures described in this SPCC Plan and are informed of the requirements under applicable pollution control laws, rules and regulations. All personnel also receive an initial 40-hour HAZWOPER training (and 8-hour annual refresher training) as per OSHA standard.

A briefing will be conducted annually with field operations personnel (including truck drivers as appropriate) as described below. A record of the annual SPCC Plan review is attached in **Appendix E, Inspection Record Forms**.

The Denham Spring Facility Environmental and Safety Coordinator conducts Spill Prevention Briefings annually to ensure adequate understanding and effective implementation of this SPCC Plan. These briefings highlight and describe known spill events or failures, malfunctioning components, and recently developed precautionary measures. The briefings are conducted in conjunction with the company safety meetings. Sign-in sheets, which include the topics of discussion at each meeting, are maintained with this Plan at the Denham Springs Facility office. An Annual Review of SPCC Plan Briefing Log form is provided in **Appendix E** and is used to document the briefings. The scheduled annual briefing includes a review of the facility's policies and procedures relating to spill prevention, control, cleanup, and reporting; procedures for routine handling of products (e.g., loading, unloading, transfers); SPCC inspections and spill prevention procedures; spill reporting procedures; spill response; and recovery, disposal, and treatment of spilled material.

Personnel are instructed in operation and maintenance of equipment to prevent the discharge of oil, and in applicable federal, state, and local pollution laws, rules, and regulations. Facility operators and other personnel have an opportunity during the briefings to share recommendations concerning health, safety, and environmental issues encountered during facility operations.

Training will include, at a minimum, the following:

- Annual review of the SPCC Plan and its contents.
- Responsibilities of personnel and Designated Person Accountable for Spill Prevention.
- Applicable pollution control laws, rules, and regulations such as EPA's SPCC regulations, Louisiana SPC regulations, etc.
- Facility operations.
- Instruction on operations and maintenance of fueling equipment and loading storage tanks, capping lines when not in use, emergency shutdown devices, fire-fighting equipment, over-fill protection devices, security, etc.
- Discharge procedures for each containment area.
- History/cause of known spill events.
- Equipment failures and operational issues.
- Recently developed measures/procedures.
- Familiarization with storage areas containing tools and equipment necessary for spill response.
- Familiarization with inspection procedures and completing the inspection forms.
- Instruction regarding proper notification procedures in the event of a spill.

Designate a person at each applicable facility who is accountable for discharge prevention and who reports to facility management – 112.7(f)(2):

Mr. Fred Guedry, Environmental and Safety Coordinator, is responsible for oil spill prevention, training, inspections, recordkeeping, and discharge notifications at this facility.

Schedule and conduct discharge prevention briefings for your oil-handling personnel at least once a year to assure adequate understanding of the SPCC Plan for that facility. Such briefings must highlight and describe known discharges as described in §112.1(b) or failures, malfunctioning components, and any recently developed precautionary measures – 112.8(f)(3):

A briefing will be conducted annually to explain modifications to the SPCC Plan that may be made to accommodate changes to facility operations or storage inventory. A record of the annual SPCC Plan review is attached in **Appendix E, Inspection Record Forms**.

6.11 SECURITY (EXCLUDING OIL PRODUCTION FACILITIES) – 40 CFR 112.7(g)

Describe in your Plan how you secure and control access to the oil handling, processing and storage areas – 112.7(g)(1):

All facility ASTs at Denham Springs Facility are located behind fencing and only trained oil handling personnel are allowed to enter the AST area. The fencing includes an entry gate which remains locked during periods in which the facility is unattended.

Secure master flow and drain valves – 112.7(g)(2):

The containment basin drain valve must be kept closed and locked when not in use to prevent unsupervised drainage of the secondary containment and the direct outward flow of spilled substances from tanks or associated lines from entering the waters of the state. Additionally, tank valves shall also be kept in the closed position and locked when not in use. Any leaks associated with ASTs would be contained within the secondary containment system.

Prevent unauthorized access to starter controls on oil pumps – 112.7(g)(3):

Starter controls are located in a locked building adjacent to the storage area and only accessible by authorized facility personnel.

Secure out-of-service and loading/unloading connections of oil pipelines – 112.7(g)(4):

The facility securely caps or blank-flanges the loading/unloading connections of facility piping when not in service or when in standby service for an extended period of time, or when piping is emptied of liquid content either by draining or by inert gas pressure.

Address the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges – 112.7(g)(5):

Outdoor facility lighting is sufficient for facility operations personnel or non-operating personnel to discover a spill in the storage or the loading/unloading areas during hours of darkness, as well as to deter acts of vandalism

6.12 FACILITY TANK CAR AND TANK TRUCK LOADING/UNLOADING RACK (EXCLUDING OFFSHORE FACILITIES) – 40 CFR 112.7(h)

Where loading/unloading rack drainage does not flow into a catchment basin or treatment facility designed to handle discharges, use a quick drainage system for tank car or tank truck loading/unloading racks. You must design any containment system to hold at least the maximum capacity of any single compartment of a tank car or tank truck loaded or unloaded at the facility – 112.7(h)(1):

There is a loading rack at the facility which is in Containment Area No. 3. Containment Area No. 3, comprised of concrete curbs, walls, and rollover berms with a uniform depth of 4 inches, has a volume of 4,844 gallons. The largest single tank truck compartment loaded or unloaded at the facility is 1,500 gallons, resulting in 3,194 gallons of freeboard in the containment area (294 percent). Water and other liquids drain from the containment area into a sump containing the oil water separator. Once the oil and water have been separated, the water is pumped into Containment Area No. 1. Water inside Containment Area No. 1 is released to the facility's drainage system if no sheen or oil residue is observed. If a sheen or oil residue is observed, the facility contracts a vacuum truck to remove the liquid in Containment Area No. 1 and all liquid in the sump for the oil water separator. Transfer procedures as outlined in **Table 4, Oil Product Transfer Procedures**, and **Table 5, Vehicle and Equipment Fueling Procedures**, in **Appendix B, Tables**, should be followed.

Provide an interlocked warning light or physical barrier system, warning signs, wheel chocks or vehicle brake interlock system in the area adjacent to a loading/unloading rack, to prevent vehicles from departing before complete disconnection of flexible or fixed oil transfer lines – 112.7(h)(2):

All suppliers must meet the minimum requirements and regulations for tank truck loading/unloading established by the U.S. Department of Transportation. The Denham Springs Facility ensures that the vendor understands the site layout, knows the protocol for entering the facility and unloading product, and has the necessary equipment to respond to a discharge from the vehicle or fuel delivery hose.

The Denham Springs Facility Environmental and Safety Coordinator or his designee supervises oil deliveries for all new suppliers, and periodically observes deliveries for existing, approved suppliers.

All loading and unloading of tank vehicles takes place only in the designated loading rack/unloading area.

Vehicle filling operations are performed by facility personnel trained in proper discharge prevention procedures. The truck driver or facility personnel remain with the vehicle at all times while fuel is being transferred. Transfer operations are performed according to the minimum procedures outlined in **Table 4, Oil Product Transfer Procedures**, and **Table 5, Vehicle and Equipment Fueling Procedures**, in **Appendix B, Tables**.

Prior to filling and departure of any tank car or tank truck, closely inspect for discharges from the lowermost drain and all outlets of such vehicles, and if necessary, ensure that they are tightened, adjusted, or replaced to prevent liquid discharge while in transit – 112.7(h)(3):

Proper transfer procedures as outlined in **Table 4, Oil Product Transfer Procedures**, and **Table 5, Vehicle and Equipment Fueling Procedures**, in **Appendix B, Tables**, should be followed.

6.13 FIELD-CONSTRUCTED ABOVE GROUND TANKS – 40 CFR 112.7(i)

If a field-constructed aboveground container undergoes a repair, alteration, reconstruction, or a change in service that might affect the risk of a discharge or failure due to brittle fracture or other catastrophe, or has discharged oil or failed due to brittle fracture failure or other catastrophe, evaluate the container for risk of discharge or failure due to brittle fracture or other catastrophe, and as necessary, take appropriate action.

Brittle fracture tests are not required for this facility since none of the bulk storage tanks at the site are field-constructed.

However, in the event that any tank undergoes a repair, alteration, reconstruction, or change in service that might affect the risk of a discharge or failure, the container will be evaluated for risk of discharge or failure, following API-653 or an equivalent approach, and corrective action will be taken as necessary.

6.14 MORE STRINGENT REGULATIONS – 40 CFR 112.7(j)

In addition to the minimal prevention standards listed under this section, include in your Plan a complete discussion of conformance with the applicable requirements and other effective discharge prevention and containment procedures listed in this part or any applicable more stringent State rules, regulations, and guidelines:

This plan meets the requirements of the Louisiana SPCC regulations [Louisiana Administrative Code, Title 33, Part IX (LAC 33:IX), Chapter 9]. The provisions of LAC 33:IX Chapter 9 apply to facilities with minimum aboveground storage capacity of oil or regulated materials of 1,320 gallons, or a single container of 660 gallons or greater

containing hazardous chemicals listed in the *Notification Regulations and Procedures for Unauthorized Discharges* published by the LDEQ.

6.15 QUALIFIED OIL-FILLED OPERATIONAL EQUIPMENT – 40 CFR 112.7(k)

The owner or operator of a facility with oil-filled operational equipment that meets the qualification criteria in paragraph (k)(1) of this sub-section may choose to implement for this qualified oil-filled operational equipment the alternate requirements as described in paragraph (k)(2) of this sub-section in lieu of general secondary containment required in paragraph (c) of this section:

Not applicable for this facility.

7.0 SPECIFIC REQUIREMENTS – 40 CFR 112.8

7.1 GENERAL REQUIREMENTS AND SPECIFIC PROCEDURES – 40 CFR 112.8(a)

The owner/operator of an onshore facility (excluding a product facility) must meet the general requirements for the Plan under 112.7, and the specific discharge prevention and containment procedures listed in this section – 112.8(a):

This Plan has been developed for the Denham Springs Facility to ensure that, when properly implemented and maintained, the facility will be in conformance with the applicable requirements established in 40 CFR 112.7 and the specific prevention and containment procedures listed in 40 CFR 112.8. This Plan has full approval of management at a level of authority to commit resources necessary to fully implement the Plan. Responsibility for the day-to-day administration of the SPCC Plan and all discharge prevention activities at the facility is the Environmental and Safety Coordinator.

7.2 FACILITY DRAINAGE – 40 CFR 112.8(b)

Restrain drainage from diked storage areas by valves to prevent a discharge into the drainage system or facility effluent treatment system, except where facility systems are designed to control such discharge. You may empty diked areas by pumps or ejectors; however, you must manually activate these pumps or ejectors and must inspect the condition of the accumulation before starting, to ensure no oil will be discharged – 112.8(b)(1):

Containment Areas No. 1 and No. 2 are equipped with manually-operated valves that allow for controlled discharge of contained liquids into the facility's ditch system. The valves are kept closed and locked when not in use. Contained liquids from the containment area are inspected prior to discharge for any indication that a spill has occurred.

Use valves of manual, open-and-closed design, for the drainage of diked areas. You may not use flapper-type valves to drain diked areas. If your facility drainage drains directly into a watercourse and not into an on-site wastewater treatment plant, you must inspect and may drain uncontaminated retained stormwater as provided in paragraphs (c)(3)(ii), (iii) and (iv) of this section – 112.8(b)(2):

Containment Areas No. 1 and No. 2 are equipped with manually-operated valves that allow for controlled discharge of contained liquids into the facility's ditch system. The valves are kept closed and locked when not in use. Contained liquids from the containment area are inspected prior to discharge for any indication that a spill has occurred. If the volume of spilled product exceeds the capacity of the facility personnel to address, the emergency response contractor shall be contacted to remove the product prior to discharge. Contact information for the emergency response contractor is included in **Appendix C, Emergency Notification Phone List**. Records will be kept of all discharge events. The

report form for recording secondary containment drainage is included in **Appendix E, Inspection Record Forms**.

Design facility drainage systems from undiked areas with a potential for a discharge (such as where piping is located outside containment walls or where tank truck discharges may occur outside the loading area) to flow into ponds, lagoons, or catchment basins designed to retain oil or return it to the facility. You must not locate catchment basins in areas subject to periodic flooding – 112.8(b)(3):

Discharges from undiked areas are routed to the storm drains on the northeast side of the facility and ditches on the southwest side. Booms are stored in the warehouses to be rapidly deployed at the facility boundary to prevent spills from leaving the facility.

If facility drainage is not engineered as in paragraph (b)(3) of this section, equip the final discharge of all ditches inside the facility with a diversion system that would, in the event of an uncontrolled discharge, retain oil in the facility – 112.8(b)(4):

Discharges from undiked areas are routed to the storm drains on the northeast side of the facility and ditches on the southwest side. Booms are stored in the warehouses to be rapidly deployed at the facility boundary to prevent spills from leaving the facility.

Where drainage waters are treated in more than one treatment unit and such treatment is continuous, and pump transfer is needed, provide two “lift” pumps and permanently install at least one of the pumps. Whatever techniques you use, you must engineer facility drainage systems to prevent a discharge as described in §112.1(b) in case there is an equipment failure or human error at the facility – 112.8(b)(5):

Not applicable to the Denham Springs Facility.

7.3 BULK STORAGE CONTAINERS – 40 CFR 112.8(c)

Do not use a container for the storage of oil unless its material and construction are compatible with the material stored and conditions of storage such as pressure and temperature – 112.8(c)(1):

All oil storage tanks are shop-built and meet the API tank construction standard. Their design and construction are compatible with the material they contain and the temperature and pressure conditions of storage. Steel tanks are coated to minimize corrosion.

Construct all bulk storage tank installations (except mobile refuelers and other non-transportation-related tank trucks) so that you provide a secondary means of containment for the entire capacity of the largest single container and sufficient freeboard to contain precipitation. You must ensure that diked areas are sufficiently impervious to contain discharged oil. Dikes, containment curbs, and pits are commonly employed for this purpose. You may also use an alternative system consisting of a drainage trench enclosure that must be arranged so that any discharge

will terminate and be safely confined in a facility catchment basin or holding pond – 112.8(c)(2):

All ASTs are located within containment basins which are large enough to contain the volume of the largest tank plus sufficient freeboard for precipitation.

Do not allow drainage of uncontaminated rainwater from the diked area into a storm drain or discharge of an effluent into an open watercourse, lake, or pond, bypassing the facility treatment system unless you – 112.8(c)(3):

- (i) Normally keep the bypass valve sealed closed.
- (ii) Inspect the retained rainwater to ensure that its presence will not cause a discharge as described in §112.1(b).
- (iii) Open the bypass valve and reseal it following drainage under responsible supervision.
- (iv) Keep adequate records of such events, for example, any records required under permits issued in accordance with §§122.41(j)(2) and 122.41(m)(3) of this chapter.

All storage tanks are located within secondary containment areas. Containment Areas No. 1 and No. 2 are equipped with manually operated valves that allow for controlled discharge of contained material to the facilities drainage system that empties into a perimeter ditch on the south adjacent property. The valve shall be kept closed and locked when not in use. The valve shall be inspected and supervised during all controlled discharges. The water shall be inspected prior to discharge for the presence of a visible sheen or any indication that a spill has occurred. If the volume of spilled product exceeds the capacity of facility personnel to clean up, the emergency response contractor shall be contacted to remove the product prior to discharge. Contact information for the emergency response contractor is included in **Appendix C**. A secondary containment drainage record of all secondary containment discharge events is located in **Appendix E** and will be kept for a minimum of three years.

Protect any completely buried metallic storage tank installed on or after January 10, 1974, from corrosion by coatings or cathodic protection compatible with local soil conditions. You must regularly leak test such completely buried metallic storage tanks – 112.8(c)(4):

There is one buried UST with a cathodic protection system at the Denham Springs Facility. The UST is covered under the Department of Environmental Quality's Underground Storage Tank Regulations and exempt from the SPCC rule.

Do not use partially buried or bunkered metallic tanks for the storage of oil, unless you protect the buried section of the tank from corrosion. You must protect partially buried and bunkered tanks from corrosion by coatings or cathodic protection compatible with local soil conditions – 112.8(c)(5):

There are no partially buried storage tanks at the Denham Springs Facility.

Test or inspect each aboveground container for integrity on a regular schedule and whenever you make material repairs. You must determine, in accordance with industry standards, the appropriate qualifications for personnel performing tests and inspections, the frequency and type of testing and inspections, which take into account container size, configuration, and design (such as containers that are: shop-built, field-erected, skid-mounted, elevated, equipped with a liner, double-walled, or partially buried). Examples of these integrity tests include, but are not limited to: visual inspection, hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or other systems of non-destructive testing. You must keep comparison records and you must also inspect the container's supports and foundations. In addition, you must frequently inspect the outside of the container for signs of deterioration, discharges, or accumulation of oil inside diked areas. Records of inspections and tests kept under usual and customary business practices satisfy the recordkeeping requirements of this paragraph – 112.8(c)(6):

As discussed in **Section 6.2**, tanks, including supports and foundation, will undergo monthly and annual formal visual inspection for leaks, corrosion, pitting, cracking, and deterioration of foundation/supports. A monthly and annual inspection log is attached in **Appendix E, Inspection Record Forms**. All records will be kept on file at the facility for a minimum of three years. Integrity testing of ASTs will be performed, as necessary, using the schedule outlined in **Section 6.9.4**. Records resulting from integrity testing should be kept on file as long as the tank is in use at the facility. In the event that a tank is removed, integrity testing results will be retained on the site for a minimum of three years from the testing date.

Control leakage through defective internal heating coils by monitoring the steam return and exhaust lines for contamination from internal heating coils that discharge into an open watercourse, or pass the steam return or exhaust lines through a settling tank, skimmer, or other separation or retention system – 112.8(c)(7):

Not applicable to the Denham Springs Facility.

Engineer or update each container installation in accordance with good engineering practice to avoid discharges. Provide at least one of the following devices – 112.8(c)(8):

- High liquid level alarms with an audible or visual signal at a constantly attended operation or surveillance station. In smaller facilities an audible air vent may suffice.
- High liquid level pump cutoff devices set to stop flow at a predetermined container content level.
- Direct audible or code signal communication between the container gauger and the pumping station.

- A fast response system for determining the liquid level of each bulk storage container such as digital computers, telepulse, or direct vision gauges. If you use this alternative, a person must be present to monitor gauges and the overall filling of bulk storage containers.

All tanks are equipped with the following fail-safe liquid level devices: operator loading and unloading procedure, a digital computer system for determining liquid levels in the tanks, and direct vision tank gauges for determining liquid levels in the tanks.

Liquid level gauges and sensors are calibrated monthly. Tank levels are verified prior to ordering fuel for re-filling ASTs by gauging the tank.

Liquid level sensing devices should be regularly tested to ensure proper operation.

The facility is manned during receipt of fuel into ASTs.

Observe effluent treatment facilities frequently enough to detect possible system upsets that could cause a discharge as described in 40 CFR Part 112.1(b) – 112.8(c)(9):

The Denham Springs Facility does not have effluent treatment facilities. Any water requiring treatment will be removed and treated offsite.

Promptly correct visible discharges which result in a loss of oil from the container, including but not limited to seams, gaskets, piping, pumps, valves, rivets, and bolts. You must promptly remove any accumulation of oil in diked areas – 112.8(c)(10):

Visible discharges from any container or appurtenance – including seams, gaskets, piping, pumps, valves, rivets, and bolts – are quickly corrected upon discovery.

Storage tanks and all ancillary equipment are visually inspected daily as a result of routine operations, and formally inspected monthly. Potential structural failures, housekeeping problems, and general tank conditions resulting in a loss of petroleum product will be promptly corrected. Any accumulation of visible discharge will be promptly removed.

Position or locate mobile or portable oil storage containers to prevent a discharge as described in §112.1(b). Except for mobile refuelers and other non-transportation-related tank trucks, you must furnish a secondary means of containment, such as a dike or catchment basin, sufficient to contain the capacity of the largest single compartment or container with sufficient freeboard to contain precipitation - 112.8(c)(11):

Portable containers including up to one thousand 5-gallon pails, two hundred 55-gallon drums, and forty 330-gallon totes may be stored on site at any time. The small portable oil storage containers are stored inside the storage buildings where secondary containment is provided by the building structure. Any discharged material is quickly contained and

cleaned up using the sorbent pads and appropriate cleaning products that are stored in the spill kits which are located within the storage buildings.

7.4 TRANSFER OPERATIONS, PUMPING, AND IN-PLANT PROCESS – 40 CFR 112.8(d)

Provide buried piping that is installed or replaced on or after August 16, 2002, with a protective wrapping and coating. You must also cathodically protect such buried piping installations or otherwise satisfy the corrosion protection standards for piping in part 280 of this chapter or a State program approved under part 281 of this chapter. If a section of buried line is exposed for any reason, you must carefully inspect it for deterioration. If you find corrosion damage, you must undertake additional examination and corrective action as indicated by the magnitude of the damage – 112.8(d)(1):

The Denham Springs Facility utilizes both aboveground and underground piping. Underground piping is utilized for the 10,000-gallon UST. The piping is cathodically protected from corrosion by the same magnesium anode as the tank. Buried piping was installed at the facility prior to August 12, 2002. When a section of buried line is exposed, it is carefully examined for deterioration. If corrosion damage is found, additional examination and corrective action must be taken as deemed appropriate considering the magnitude of the damage. Additionally, the Denham Springs Facility conducts integrity and leak testing of buried piping at the time of installation, modification, construction, relocation, or replacement. Records of all tests are kept at the facility for at least three years.

Cap or blank-flange the terminal connection at the transfer point and mark it as to origin when piping is not in service or is in standby service for an extended time – 112.8(d)(2):

Valves will be kept closed and locked during periods of inactivity. The pipe connections will be capped or blank-flanged when not in use and marked accordingly.

Properly design pipe supports to minimize abrasion and corrosion and allow for expansion and contraction – 112.8(d)(3):

All pipe supports are designed to minimize abrasion and corrosion and to allow for expansion and contraction. Pipe supports are visually inspected during the monthly inspection of the facility.

Regularly inspect all aboveground valves, piping, and appurtenances. The inspection must assess the general condition of items, such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces. Integrity and leak testing of buried piping must also be conducted at the time of installation, modification, construction, relocation, or replacement – 112.8(d)(4):

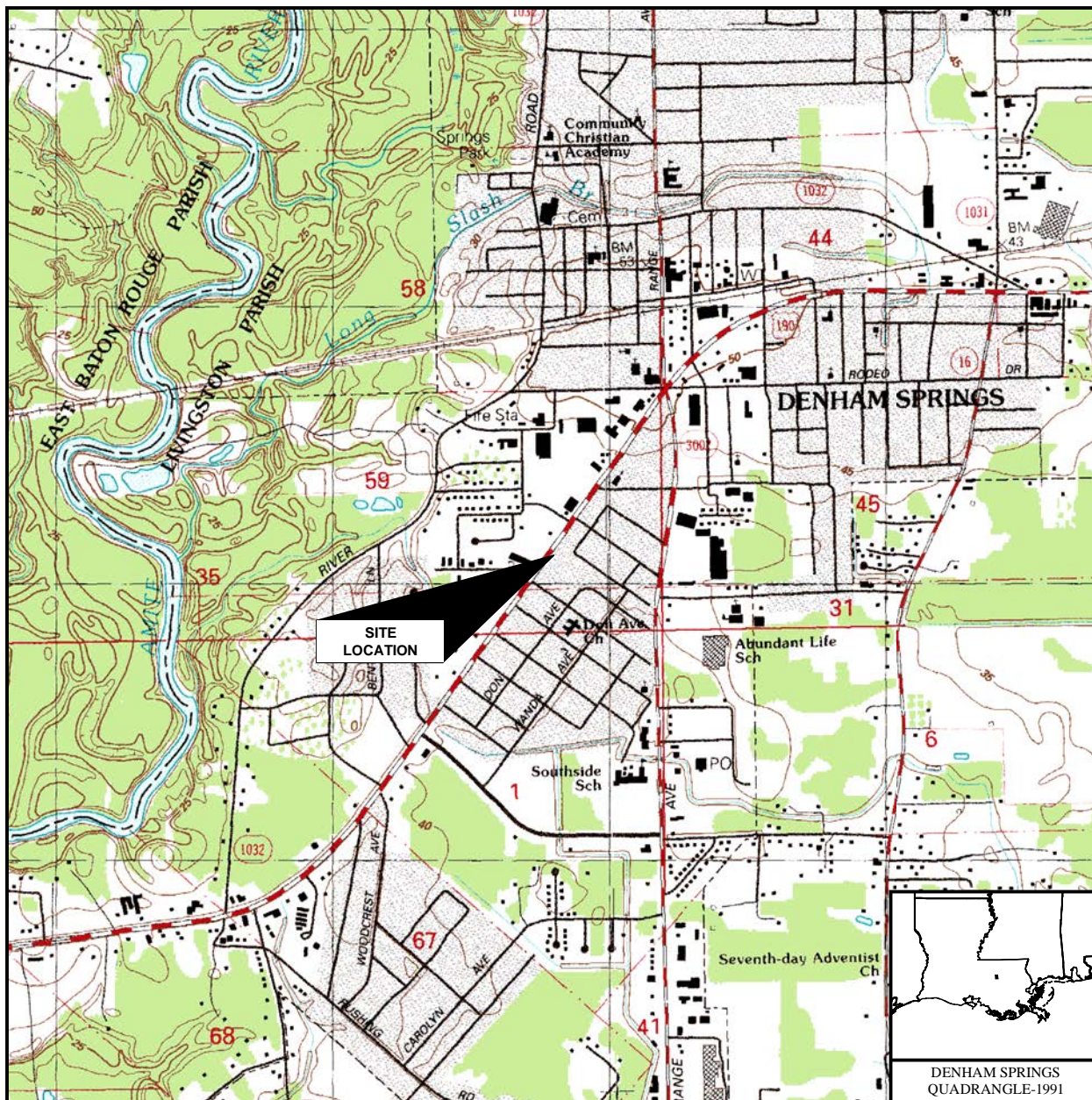
All aboveground piping and appurtenances are formally inspected monthly. Inspection includes aboveground valves, piping, appurtenances, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces. Inspection forms are included in **Appendix E**, and will be kept on file at the facility for a minimum of three years.

Warn all vehicles entering the facility to be sure that no vehicle will endanger aboveground piping or other oil transfer operations – 112.8(d)(5):

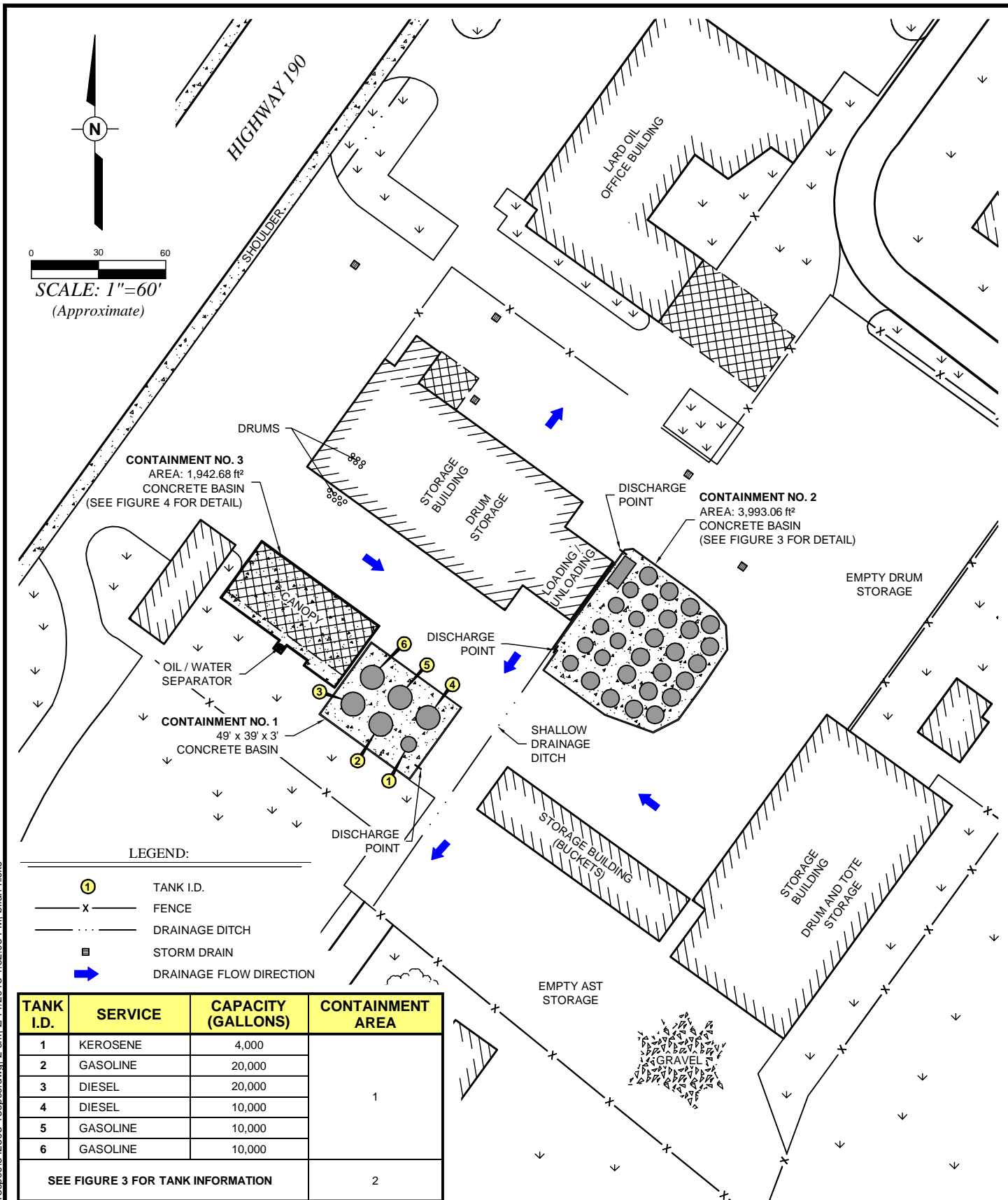
Warning signs are posted at appropriate locations throughout the facility to prevent vehicles from damaging aboveground piping and appurtenances. Most of the aboveground piping is located within areas that are not accessible to vehicular traffic (e.g., inside diked area or behind bollards). Brightly painted bollards are placed where needed to prevent vehicular collisions with equipment.

APPENDICES

APPENDIX A – FIGURES



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DRAWN DATE:

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PROJECT NUMBER:

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BILLING GROUP:

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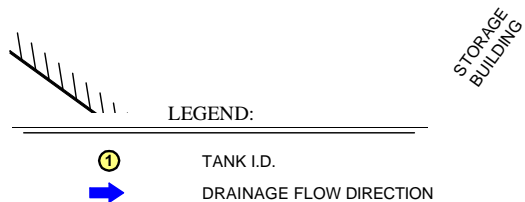
LARD OIL COMPANY, INC.
DENHAM SPRINGS FACILITY
914 FLORIDA BOULEVARD
DENHAM SPRINGS, LOUISIANA

SITE MAP

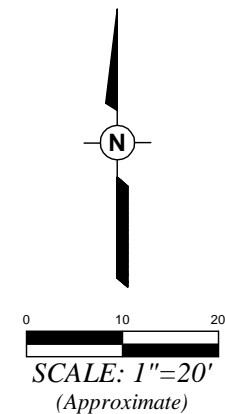
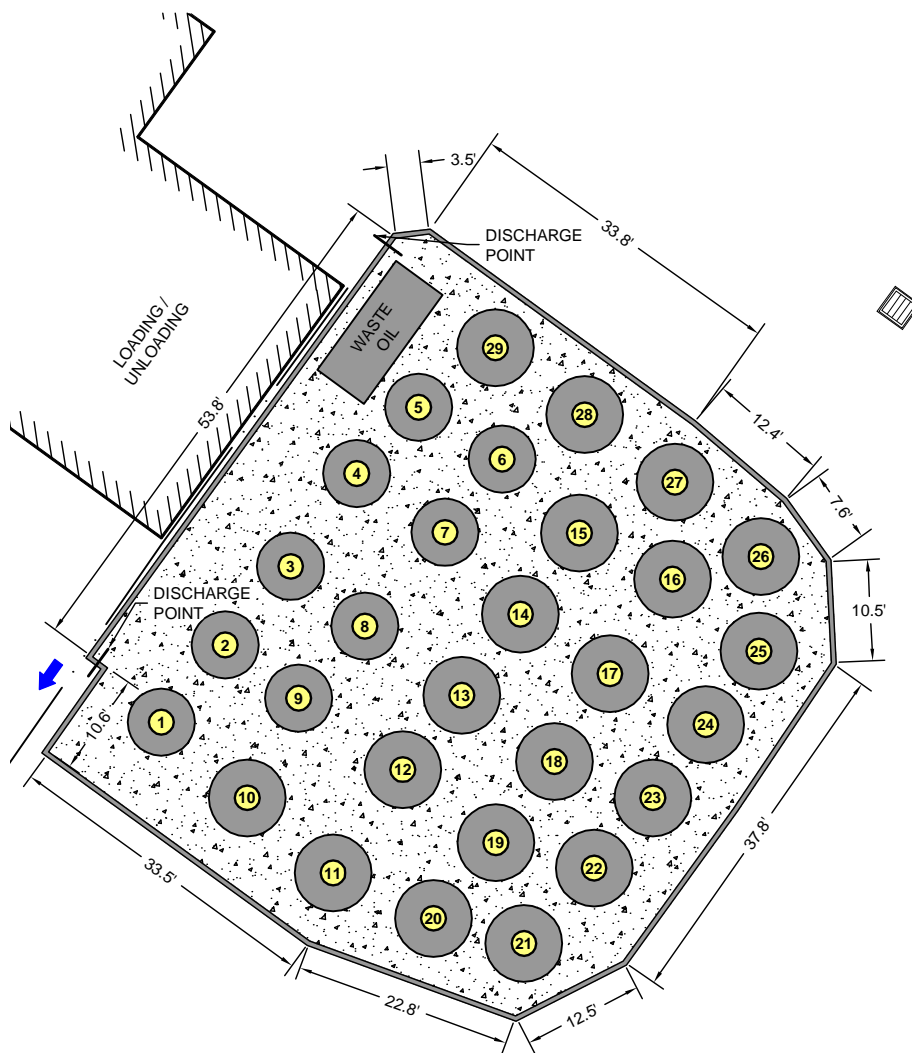
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2

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TANK I.D.	SERVICE	CAPACITY (GALLONS)	CONTAINMENT AREA
1	LUBE OIL	3,000	2
2	LUBE OIL	3,000	
3	LUBE OIL	3,000	
4	LUBE OIL	3,000	
5	LUBE OIL	3,000	
6	LUBE OIL	3,000	
7	LUBE OIL	3,000	
8	LUBE OIL	3,000	
9	LUBE OIL	3,000	
10	LUBE OIL	6,500	
11	LUBE OIL	8,000	
12	LUBE OIL	6,500	
13	LUBE OIL	6,500	
14	LUBE OIL	6,500	
15	LUBE OIL	6,500	
16	LUBE OIL	6,500	
17	LUBE OIL	6,500	
18	LUBE OIL	6,500	
19	LUBE OIL	6,500	
20	LUBE OIL	6,500	
21	LUBE OIL	6,500	
22	LUBE OIL	6,500	
23	LUBE OIL	6,500	
24	LUBE OIL	6,500	
25	LUBE OIL	6,500	
26	LUBE OIL	6,500	
27	LUBE OIL	6,500	
28	LUBE OIL	6,500	
29	LUBE OIL	6,500	



PPM CONSULTANTS, INC.

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DRAWN DATE:

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PROJECT NUMBER:

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BILLING GROUP:

13SPCC

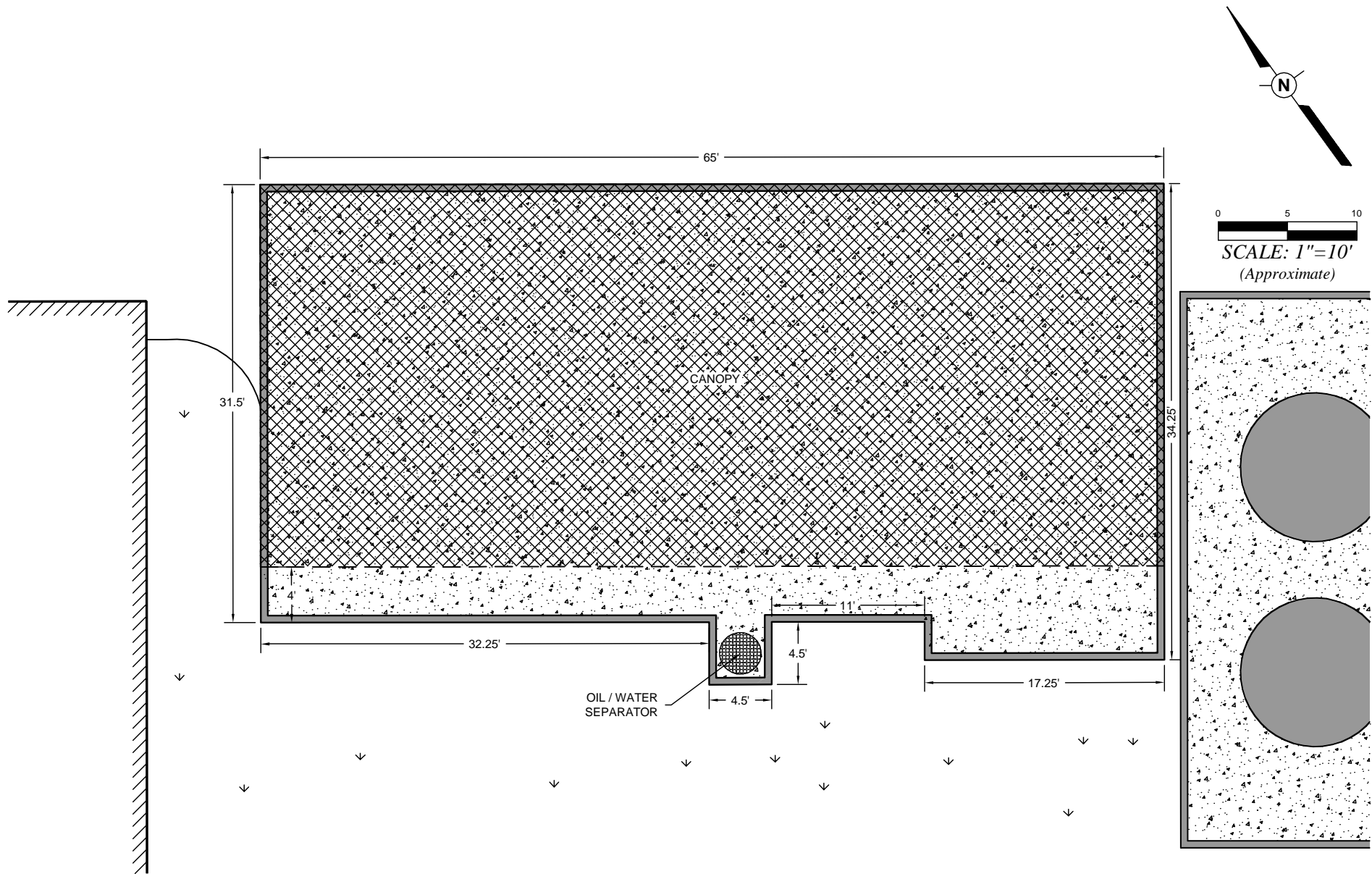
LARD OIL COMPANY, INC.
DENHAM SPRINGS FACILITY
914 FLORIDA BOULEVARD
DENHAM SPRINGS, LOUISIANA

CONTAINMENT AREA NO. 2 DETAIL

FIGURE
NUMBER

3

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PPM CONSULTANTS, INC.

DRAWN BY:

BWH

DRAWN DATE:

2/06/13

PROJECT NUMBER:

542303

BILLING GROUP:

13SPCC

LARD OIL COMPANY, INC.
DENHAM SPRINGS FACILITY
914 FLORIDA BOULEVARD
DENHAM SPRINGS, LOUISIANA

CONTAINMENT AREA NO. 3 DETAIL

FIGURE
NUMBER

4

APPENDIX B – TABLES

**TABLE 1
STORAGE TANK INVENTORY AND TESTING SCHEDULE**

**Lard Oil Company, Inc.
Denham Springs Facility
Denham Springs, Louisiana**

TANK/CONTAINER INFORMATION							INSPECTIONS/INTEGRITY TESTING FREQUENCY				SECONDARY CONTAINMENT					
ID	Contents	Type	Shell	Level Alarm ?	Over Fill ?	Capacity (gal)	Method	AST Cat.*	Certified Inspect. (yr)	Leak Test (yr)	ID	Type	Largest Tank (gal)	10% of Largest Tank	Net Dike Cap. (gal)	Adequate Dike Cap.?
30	Kerosene	VAST	Steel/SW	Yes	Yes	4,000	SP-001	1	20	NS	1	Concrete	20,000	2,000	33,950	Yes
31	Gasoline	VAST	Steel/SW	Yes	Yes	20,000										
32	Diesel	VAST	Steel/SW	Yes	Yes	20,000										
33	Diesel	VAST	Steel/SW	Yes	Yes	10,000										
34	Gasoline	VAST	Steel/SW	Yes	Yes	10,000										
35	Gasoline	VAST	Steel/SW	Yes	Yes	10,000										
1	Lube Oil	VAST	Steel/SW	No	Yes	3,000	SP-001	1	NS	NS	2	Concrete	8,000	800	22,231	Yes
2	Lube Oil	VAST	Steel/SW	No	Yes	3,000	SP-001	1	NS	NS						
3	Lube Oil	VAST	Steel/SW	No	Yes	3,000	SP-001	1	NS	NS						
4	Lube Oil	VAST	Steel/SW	No	Yes	3,000	SP-001	1	NS	NS						
5	Lube Oil	VAST	Steel/SW	No	Yes	3,000	SP-001	1	NS	NS						
6	Lube Oil	VAST	Steel/SW	No	Yes	3,000	SP-001	1	NS	NS						
7	Lube Oil	VAST	Steel/SW	No	Yes	3,000	SP-001	1	NS	NS						
8	Lube Oil	VAST	Steel/SW	No	Yes	3,000	SP-001	1	NS	NS						
9	Lube Oil	VAST	Steel/SW	No	Yes	3,000	SP-001	1	NS	NS						
10	Lube Oil	VAST	Steel/SW	No	Yes	6,500	SP-001	1	20	NS						
11	Lube Oil	VAST	Steel/SW	No	Yes	8,000	SP-001	1	20	NS						
12	Lube Oil	VAST	Steel/SW	No	Yes	6,500	SP-001	1	20	NS						
13	Lube Oil	VAST	Steel/SW	No	Yes	6,500	SP-001	1	20	NS						
14	Lube Oil	VAST	Steel/SW	No	Yes	6,500	SP-001	1	20	NS						
15	Lube Oil	VAST	Steel/SW	No	Yes	6,500	SP-001	1	20	NS						
16	Lube Oil	VAST	Steel/SW	No	Yes	6,500	SP-001	1	20	NS						
17	Lube Oil	VAST	Steel/SW	No	Yes	6,500	SP-001	1	20	NS						
18	Lube Oil	VAST	Steel/SW	No	Yes	6,500	SP-001	1	20	NS						
19	Lube Oil	VAST	Steel/SW	No	Yes	6,500	SP-001	1	20	NS						
20	Lube Oil	VAST	Steel/SW	No	Yes	6,500	SP-001	1	20	NS						
21	Lube Oil	VAST	Steel/SW	No	Yes	6,500	SP-001	1	20	NS						
22	Lube Oil	VAST	Steel/SW	No	Yes	6,500	SP-001	1	20	NS						
23	Lube Oil	VAST	Steel/SW	No	Yes	6,500	SP-001	1	20	NS						
24	Lube Oil	VAST	Steel/SW	No	Yes	6,500	SP-001	1	20	NS						
25	Lube Oil	VAST	Steel/SW	No	Yes	6,500	SP-001	1	20	NS						
26	Lube Oil	VAST	Steel/SW	No	Yes	6,500	SP-001	1	20	NS						
27	Lube Oil	VAST	Steel/SW	No	Yes	6,500	SP-001	1	20	NS						
28	Lube Oil	VAST	Steel/SW	No	Yes	6,500	SP-001	1	20	NS						
29	Lube Oil	VAST	Steel/SW	No	Yes	6,500	SP-001	1	20	NS						
	Waste Oil	HAST	Steel/SW	No	Yes	1,000	SP-001	1	NS	NS						

**TABLE 1
STORAGE TANK INVENTORY AND TESTING SCHEDULE**

**Lard Oil Company, Inc.
Denham Springs Facility
Denham Springs, Louisiana**

TANK/CONTAINER INFORMATION							INSPECTIONS/INTEGRITY TESTING FREQUENCY				SECONDARY CONTAINMENT					
ID	Contents	Type	Shell	Level Alarm ?	Over Fill ?	Capacity (gal)	Method	AST Cat.*	Certified Inspect. (yr)	Leak Test (yr)	ID	Type	Largest Tank (gal)	10% of Largest Tank	Net Dike Cap. (gal)	Adequate Dike Cap.?
--	Lubricating Oil	Totes (40 x 330 gal)	Plastic/SW	No	Yes	13,200	NA	NA	NS	NS	Indoor Storage					
--	Lubricating Oil	Drums (200 x 55 gal)	Plastic/SW	No	Yes	11,000	NA	NA	NS	NS	Indoor Storage					
--	Lubricating Oil	Pails (1000 x 5 gal)	Plastic/SW	No	Yes	5,000	NA	NA	NS	NS	Indoor Storage					
--	Varsol	UST	Steel	No	Yes	10,000	In compliance with UST regulations				In compliance with UST regulations					
--	Oil	Trucks	Steel	NA	NA	1,500	NA	NA	NA	NA	3	Concrete	1,500	150	4,694	Yes
TOTAL INVENTORY:						274,200										

NOTE: All tanks and containers require daily, monthly, and annual inspections. Daily inspections are undocumented. Monthly and annual inspections are documented.

HAST - Horizontal Aboveground Storage Tank

VAST - Verticle Aboveground Storage Tank

SW - Single Wall

DW - Double Wall

NS - Integrity test Not Scheduled, unless warranted based on findings during visual inspections.

NR - Not Required. Located under a roof area.

The frequency of inspections above is based on implementation of a scheduled inspection/testing program.

If warranted, inspections may require integrity tests to occur more frequently than specified.

Containment Area:

1 Located on the southwest portion of the site

2 Located in the central portion of the site adjacent to the east side of the main storage building

**TABLE 2
SPILL RESPONSE PROCEDURE**

**Lard Oil Company, Inc.
Denham Springs Facility
Denham Springs, Louisiana**

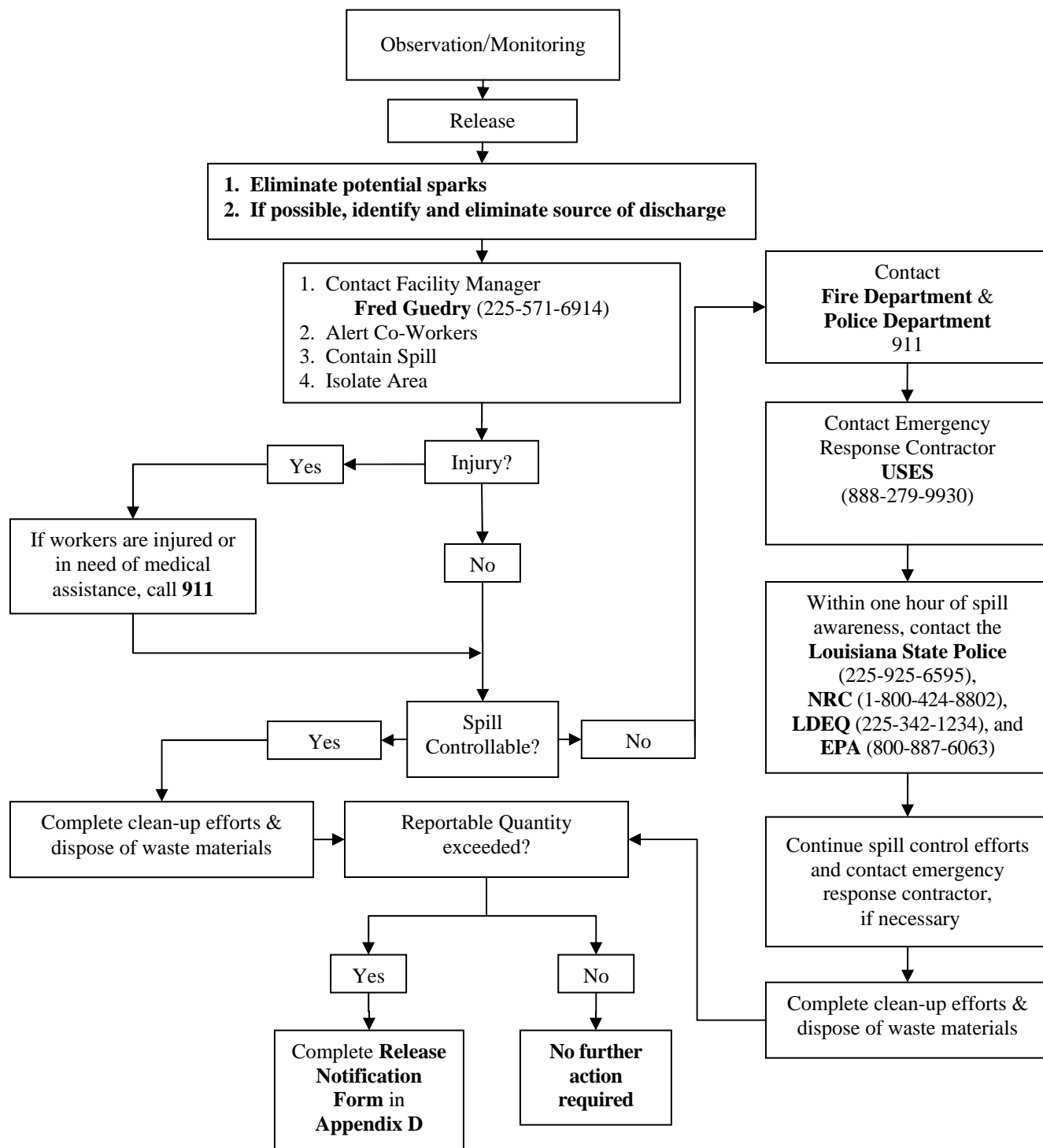


TABLE 3
POTENTIAL DISCHARGE VOLUMES AND DIRECTION OF FLOW

Lard Oil Company, Inc.
Denham Springs Facility
Denham Springs, Louisiana

Potential Event	Maximum Volume Released (gallons)	Maximum Discharge Rate	Direction of Flow	Secondary Containment
Containment Area No. 1 – Bulk Fuel Storage Area				
Failure of aboveground tank (collapse or puncture below product level)	20,000	Gradual to very fast	West then south to drainage ditch	Diked containment, sorbent material
Tank overfill	120	60 gal/min		
Pipe failure	120	40 gal/min		
Leaking pipe or valve packing	20,000	20 gal/min		
Containment Area No. 2 – Bulk Lube Storage Area				
Failure of aboveground tank (collapse or puncture below product level)	8,000	Gradual to very fast	West toward drainage ditch or east then north to unloading area	Diked containment, sorbent material
Tank overfill	120	60 gal/min		
Pipe failure	120	40 gal/min		
Leaking pipe or valve packing	8,000	2 gal/min		
Loading/Unloading Area				
Tank truck leak or failure	1,500	Gradual to instantaneous	East to drainage ditch	Diked containment, building structure, sorbent material
Hose leak during truck loading	20	10 gal/min		
Three Storage Buildings				
Leak or failure of drums or totes	55-330	Gradual to instantaneous	Will remain within storage building and covered areas	Building structure, sorbent material
Hose leak during transfer operations	20	10 gal/min		

TABLE 4
OIL PRODUCT TRANSFER PROCEDURES

Lard Oil Company, Inc.
Denham Springs Facility
Denham Springs, Louisiana

Stage	Tasks
Prior to Off-Loading	<ul style="list-style-type: none"> <input type="checkbox"/> Visually check all hoses for leaks and wet spots. <input type="checkbox"/> Verify that sufficient volume is available in the storage tank. <input type="checkbox"/> Verify all drainage valves of the secondary containment surface are in the closed position. <input type="checkbox"/> Secure the tank vehicle with wheel chocks and interlocks. <input type="checkbox"/> Ensure that the vehicle's parking brakes are set. <input type="checkbox"/> Verify proper alignment of valves and proper functioning of the pumping system. <input type="checkbox"/> If filling a tank truck, inspect the lowermost drain and all outlets. <input type="checkbox"/> Establish adequate bonding/grounding prior to connecting to the product transfer point. <input type="checkbox"/> Turn off cell phone.
During Off-Loading	<ul style="list-style-type: none"> <input type="checkbox"/> Driver must stay with the vehicle at all times during off-loading activities. <input type="checkbox"/> Periodically inspect all systems, hoses, and connections. <input type="checkbox"/> When off-loading, keep internal and external valves on the receiving tank open along with the pressure relief valves, if applicable. <input type="checkbox"/> When making a connection, shut off the vehicle engine. When transferring, shut off the vehicle engine unless it is used to operate a pump. <input type="checkbox"/> Maintain communication with the pumping and receiving stations. <input type="checkbox"/> Monitor the liquid level in the receiving tank to prevent overflow. <input type="checkbox"/> Monitor flow meters to determine rate of flow. <input type="checkbox"/> When topping off the tank, reduce flow rate to prevent overflow.
After Off-Loading	<ul style="list-style-type: none"> <input type="checkbox"/> Make sure the transfer operation is completed and lock valve. <input type="checkbox"/> Close all tank and off-loading valves before disconnecting. <input type="checkbox"/> Securely close all vehicle internal, external, and dome cover valves before disconnecting. <input type="checkbox"/> Secure all hatches. <input type="checkbox"/> Disconnect bonding/grounding wires. <input type="checkbox"/> Make sure the hoses are drained to remove the remaining product before moving them away from the connection. Use a drip pan. <input type="checkbox"/> Cap the end of the hose and other connecting devices before moving them to prevent uncontrolled leakage. <input type="checkbox"/> Remove wheel chocks and interlocks. <input type="checkbox"/> Inspect the lowermost drain and all outlets on tank truck prior to departure. If necessary, tighten, adjust, or replace caps, valves, or other equipment to prevent oil leaking while in transit.

TABLE 5
VEHICLE AND EQUIPMENT FUELING PROCEDURES

Lard Oil Company, Inc.
Denham Springs Facility
Denham Springs, Louisiana

Stage	Tasks
Prior to Fueling	<input type="checkbox"/> Visually check all hoses for leaks and wet spots. <input type="checkbox"/> Verify that sufficient volume is available in the fuel tank. <input type="checkbox"/> Ensure that the vehicle's parking brakes are set. <input type="checkbox"/> Verify proper alignment of valves and proper functioning of the fuel dispensing system. <input type="checkbox"/> When fueling a vehicle or facility equipment, inspect for leaks. <input type="checkbox"/> Establish adequate bonding/grounding prior to connecting to the fuel transfer point. <input type="checkbox"/> Turn off cell phone.
During Fueling	<input type="checkbox"/> Driver must stay with the vehicle at all times during fueling activities. <input type="checkbox"/> Periodically inspect all systems, hoses, and connections. <input type="checkbox"/> Shut off the vehicle engine. <input type="checkbox"/> Monitor the liquid level in the receiving tank to prevent overflow. <input type="checkbox"/> Monitor flow meters to determine rate of flow. <input type="checkbox"/> When topping off the tank, reduce flow rate to prevent overflow.
After Fueling	<input type="checkbox"/> Make sure the fueling operation is completed. <input type="checkbox"/> Return the fueling hose to the dispenser. <input type="checkbox"/> Turn off the dispenser. <input type="checkbox"/> Place the fuel cap onto the fueling port. <input type="checkbox"/> Inspect the vehicle or equipment prior to departure. If necessary, tighten, adjust, or replace caps, valves, or other equipment to prevent fuel leaking while in use. <input type="checkbox"/> Cleanup or report spills should they occur following proper procedures.

APPENDIX C – EMERGENCY NOTIFICATION PHONE LIST

EMERGENCY NOTIFICATION PHONE LIST

**LARD OIL COMPANY, INC.
DENHAM SPRINGS FACILITY
DENHAM SPRINGS, LOUISIANA**

CONTACT	PHONE NO.	MOBILE NO.
IN THE EVENT OF A RELEASE, NOTIFY IMMEDIATELY IN THE ORDER SHOWN BELOW:		
Internal Notifications - Local Response Team:		
<i>Qualified Individual</i> Mr. Fred Guedry – Environmental and Safety Coordinator	225-664-3311	225-571-6914
<i>Alt. Qualified Individual</i> Mr. Craig Petry – Plant Manager	225-664-3311	337-852-9264
Local Emergency Response Agencies:		
Fire/Police/Local Ambulance	911	
Emergency Response Contractor:		
USES	504-279-9930	888-279-9930
Environmental Consultant:		
PPM Consultants, Inc.	225-293-7270	
Federal and State Agencies:		
Louisiana State Police	225-925-6595 (24-hour)	
National Response Center (NRC)	800-424-8802 (24-hour)	
Livingston Parish Office of Homeland Security & Emergency Preparedness	225-686-2241	
Louisiana Department of Environmental Quality (LDEQ)	225-342-1234 (24-hour)	
U.S. EPA, Region VI	800-887-6063 (24-hour)	

APPENDIX D – RELEASE NOTIFICATION PROCEDURES AND FORMS

RELEASE NOTIFICATION PROCEDURES

Circumstances, instructions, and phone numbers for reporting a discharge to the National Response Center and other federal, state, and local agencies, and to other affected parties, are provided below. They are also posted at the facility in the storage shed containing the discharge response equipment. Note that any discharge to water must be reported immediately to the National Response Center.

Baton Rouge Environmental and Safety Coordinator,
Fred Guedry (24 hours)

225-571-6914

Local Emergency (fire, explosion, or other hazards)

911

Agency / Organization	Agency Contact	Circumstances	When to Notify
Federal Agencies			
National Response Center	800-424-8802	Discharge reaching navigable waters.	Immediately (verbal)
EPA Region VI (Hotline)	800-887-6063		Immediately (verbal)
EPA Region VI Regional Administrator	First Interstate Bank Tower at Fountain Place 1445 Ross Avenue, 12 th floor, Suite 1200 Dallas TX 75202	Discharge 1,000 gallons or more; or second discharge of 42 gallons or more over a 12-month period.	Written notification within 60 days (see Section 6.4.2 of this Plan) <i>40 CFR 112.4</i>
US Coast Guard	504-671-2230	Discharge reaching navigable waters	Immediately (verbal)
State Agencies			
Office of State Police, Transportation and Environmental Safety Section, Hazardous Materials Hotline	225-925-6595 or 877-925-6595	1) Injury requiring hospitalization or fatality. 2) Fire, explosion, or other impact that could affect public safety. 3) Release exceeding 24-hour reportable quantity. 4) Impact to areas beyond the facility's confines.	Immediately (verbal) Written notification to be made within 5 business days. LAC 33:V.10111
Office of State Police, Transportation and Environmental Safety Section, Hazardous Materials Hotline	225-925-6595 or 877-925-6595	Discharges that pose emergency conditions, regardless of the volume discharged.	Within 1 hour of discovery (verbal). Written notification within 7 calendar days. <i>LAC 33:I.3915.A and 3925</i>
Louisiana Department of Environmental Quality, Office of Environmental Compliance	225-763-3908 or 225-342-1234 (after business hours, weekends and holidays)	Discharges that do not pose emergency conditions but exceed a reportable quantity	Within 24 hours of discovery (verbal). Written notification within 7 calendar days. <i>LAC 33:I.3917 and 3925</i>

Agency / Organization	Agency Contact	Circumstances	When to Notify
Local Agencies			
Emergency Planning Committee	Livingston Parish 225-686-4400	1) Injury requiring hospitalization or fatality. 2) Fire, explosion, or other impact that could affect public safety. 3) Release exceeding 24-hour reportable quantity. 4) Impact to areas beyond the facility's confines.	Immediately (verbal) Written notification within 5 business days. <i>LAC 33:V.10111</i>
Others			
Response/cleanup contractors	USES 504-279-9930	Any discharge that exceeds the capacity of facility personnel to respond and cleanup.	As needed

The person reporting the discharge must provide the following information:

- Name, location, organization, and telephone number;
- Name and address of the owner/operator;
- Date and time of the incident;
- Location of the incident;
- Source and cause of discharge;
- Types of material(s) discharged;
- Total quantity of materials discharged;
- Quantity discharged in harmful quantity (to navigable waters or adjoining shorelines);
- Danger or threat posed by the release or discharge;
- Description of all affected media (e.g., water, soil);
- Number and types of injuries (if any) and damaged caused;
- Weather conditions;
- Actions used to stop, remove, and mitigate effects of the discharge;
- Whether an evacuation is needed;
- Name of individuals and/or organizations contacted; and
- Any other information that may help emergency personnel respond to the incident.

Whenever the facility discharges more than 1,000 gallons of oil in a single event, or discharges more than 42 gallons of oil in each of two discharge incidents within a 12-month period, the Environmental and Safety Coordinator must provide the following information to the U.S. Environmental Protection Agency's Regional Administrator within 60 days:

- Name of the facility;
- Name of the owner or operator;

- Location of the facility;
- Maximum storage or handling capacity and normal daily throughput;
- Corrective actions and countermeasures taken, including a description of equipment repairs and replacements;
- Description of facility, including maps, flow diagrams, and topographical maps;
- Cause of the discharge(s) to navigable waters, including a failure analysis of the system and subsystems in which the failure occurred;
- Additional preventive measures taken or contemplated to minimize possibility of recurrence; and
- Other pertinent information requested by the Regional Administrator.

The following table provides a summary of reportable quantities (RQ) for various chemicals based on the both the federal and state regulations. The highlighted cells indicate the most stringent RQ that should be used when determining the release threshold. For a complete list refer to the regulations provided in the table.

Substance	CAS	LAC 33: Part I § 3931	40 CFR 302.4	40 CFR 355, Appendix A
Gasoline (based on Benzene)	71-43-2	1 bbl 42 gallons	10 pounds 60 gallons	NA
Diesel (based on Naphthalene)	91-20-3	1 bbl 42 gallons	100 pounds 700 gallons	NA
Kerosene (based on Naphthalene)	91-20-3	1 bbl 42 gallons	100 pounds 700 gallons	NA
Oil*	NA	1 bbl 42 gallons	100 pounds 700 gallons	NA

* Includes fats, oils, or greases from animal, fish, or marine mammal origin; vegetable oils, including oils from seeds, nuts, fruits, or kernels; and other oils and greases including petroleum, fuel oil, sludge, synthetic oils, mineral oils, oil refuse, and oil mixed with waste other than dredged spoil.

RELEASE NOTIFICATION FORM

****It is not necessary to wait for all information before calling NRC****

Involved Parties			
(A) Reporting Party		(B) Suspected Responsible Party	
Name:		Name:	
Position:		Phone No.:	
Phone No.:		Company:	
Company:	Lard Oil Company, Inc.	Organization Type:	
Address:	914 Florida Boulevard	Private citizen:	
City:	Denham Springs	Private enterprise:	
State:	Louisiana	Public utility:	
Zip:	70726	Local government:	
		State government:	
		Federal government:	
		City:	State: Zip:
Were Materials Released (Y/N)?		Federally Obligated to Report (Y/N)?	
Calling for Responsible Party (Y/N)?			
Agency Called:			
NRC	Contact Name:	Report No:	Time Called:
DEQ	Contact Name:	Report No:	Time Called:
Coast Guard	Contact Name:	Report No:	Time Called:
State Police	Contact Name:	Report No:	Time Called:
Other _____	Contact Name:	Report No:	Time Called:
Incident Description			
Source and/or Cause of Incident:			
Date: Time:			
Incident Address/Location: 914 Florida Boulevard, Denham Springs, LA			
Nearest City: Denham Springs, LA			
Distance from City Limits: In City Limits			
Storage Tank Container Type:			
Tank Capacity: _____ Unit of Measure _____ Terminal Capacity: 274,300gallons			
Latitude Degrees: 30° 28' 32" N Longitude Degrees: 90° 57' 36" W			
Mile Post or River Mile:			
Materials			
Released Material: _____			
Chemical Hazards Response Information System (CHRIS) Code: _____			
Released Quantity: _____ Unit of Measure: _____ Quantity in Water: _____ Unit of Measure: _____			
Remedial Action			
Impact			
Number of injuries: _____		Number of Fatalities: _____ Offsite Impact(Y/N/U)? _____	
Were there evacuations (Y/N/U)? _____		Number Evacuated: _____	
Was there any damage (Y/N/U)? _____		Damage in Dollars: _____	
Additional Information			

APPENDIX E – INSPECTION RECORD FORMS

ANNUAL REVIEW OF SPCC PLAN

**LARD OIL COMPANY, INC.
DENHAM SPRINGS FACILITY
DENHAM SPRINGS, LOUISIANA**

By my signature below, I have reviewed the SPCC Plan for the Denham Springs Facility, and agree to the terms of this SPCC Plan and also agree to abide by the procedures contained within this document.

Date

Print Name

Signature

[illegible]

MONTHLY INSPECTION FORM

**LARD OIL COMPANY, INC.
DENHAM SPRINGS FACILITY
DENHAM SPRINGS, LOUISIANA**

TANK ID: _____

Date of Inspection	Inspection Item	Observations	Corrective Actions and Dates Performed	Inspector / Signature	Records Maintained Separately*
	Visible signs of fuel or leaks				<input type="checkbox"/>
	Visible cracks on the surface of the storage tanks				<input type="checkbox"/>
	Fire extinguisher in good condition, visible, accessible, securely mounted, marked, and tagged				<input type="checkbox"/>
	Visible signs of corrosion on the exterior surface of storage tanks				<input type="checkbox"/>
	Visible leaks at valves and flange joints connected to storage tanks				<input type="checkbox"/>
	Visible cracks in the secondary containment walls				<input type="checkbox"/>
	Visible indications of leaks outside of the secondary containment				<input type="checkbox"/>
	Visible indications of deterioration of the secondary containment walls				<input type="checkbox"/>
	Discoloration or sheen on the surface of accumulated storm water within the secondary containment area				<input type="checkbox"/>
	Tanks and unloading valves securely closed and locked				<input type="checkbox"/>

**LARD OIL COMPANY, INC.
DENHAM SPRINGS FACILITY
DENHAM SPRINGS, LOUISIANA**

TANK ID: _____

Date of Inspection	Inspection Item	Observations	Corrective Actions and Dates Performed	Inspector / Signature	Records Maintained Separately*
	Containment area clean and free of debris				<input type="checkbox"/>
	Signs of stress or deterioration from tank saddles/supports				<input type="checkbox"/>
	Lighting of the AST/dispenser area is operational				<input type="checkbox"/>
	Spill response kits present and fully supplied				<input type="checkbox"/>

** Indicate in the table if records of facility inspections are maintained separately at this facility.*

Additional Inspection Notes:

ANNUAL INSPECTION FORM

**LARD OIL COMPANY, INC.
DENHAM SPRINGS FACILITY
DENHAM SPRINGS, LOUISIANA**

TANK ID: _____

Date of Inspection	Inspection Item	Observation	Corrective Actions and Dates Performed	Inspector / Signature	Records Maintained Separately*
Secondary Containment					
	Containment Structure in satisfactory condition?				<input type="checkbox"/>
	Drainage pipes/valves fit for continued service?				<input type="checkbox"/>
Tank Foundation and Supports					
	Evidence of tank settlement or foundation washout?				<input type="checkbox"/>
	Do anchor bolts show signs of corrosion?				<input type="checkbox"/>
	Cracking or spalling of concrete pad or ring wall?				<input type="checkbox"/>
	Tank supports in satisfactory condition?				<input type="checkbox"/>
	Water able to drain away from tank?				<input type="checkbox"/>
	Grounding strap secured and in good condition?				<input type="checkbox"/>

ANNUAL INSPECTION FORM

**LARD OIL COMPANY, INC.
DENHAM SPRINGS FACILITY
DENHAM SPRINGS, LOUISIANA**

TANK ID: _____

Date of Inspection	Inspection Item	Observation	Corrective Actions and Dates Performed	Inspector / Signature	Records Maintained Separately*
Tank					
	Is there the presence of water or sludge inside the tank?				<input type="checkbox"/>
	Evidence of paint failure?				<input type="checkbox"/>
	Any distortion, buckling, denting, or bulging?				<input type="checkbox"/>
	Evidence of corrosion or cracking?				<input type="checkbox"/>
	Standing water on roof?				<input type="checkbox"/>
	Corrosion on roof?				<input type="checkbox"/>
	Holes in roof?				<input type="checkbox"/>
Double-Walled Tank					
	Is water or sludge present in the secondary tank?				<input type="checkbox"/>

ANNUAL INSPECTION FORM

**LARD OIL COMPANY, INC.
DENHAM SPRINGS FACILITY
DENHAM SPRINGS, LOUISIANA**

TANK ID: _____

Date of Inspection	Inspection Item	Observation	Corrective Actions and Dates Performed	Inspector / Signature	Records Maintained Separately*
	Is the secondary tank open to the atmosphere?				<input type="checkbox"/>
Insulated Tank					
	Insulation missing or damaged?				<input type="checkbox"/>
	Are there noticeable areas of moisture on the insulation?				<input type="checkbox"/>
	Mold on insulation?				<input type="checkbox"/>
	Insulation exhibiting damage?				<input type="checkbox"/>
	Is the insulation sufficiently protected from water intrusion?				<input type="checkbox"/>
Above Ground Piping					
	Are pipe supports in good condition?				<input type="checkbox"/>
	Is piping corroded?				<input type="checkbox"/>

ANNUAL INSPECTION FORM

**LARD OIL COMPANY, INC.
DENHAM SPRINGS FACILITY
DENHAM SPRINGS, LOUISIANA**

TANK ID: _____

Date of Inspection	Inspection Item	Observation	Corrective Actions and Dates Performed	Inspector / Signature	Records Maintained Separately*
	Any sags?				<input type="checkbox"/>
	Any leaks?				<input type="checkbox"/>
	Flanged connection bolts tight and fully engaged with no sign of wear or corrosion?				<input type="checkbox"/>
Under Ground Piping					
	Are line leak detectors operating properly?				<input type="checkbox"/>
	Was an annual leak test performed?				<input type="checkbox"/>
	Any distressed vegetation on ground surface above buried pipes?				<input type="checkbox"/>
Cathodic Protection					
	CP system functional?				<input type="checkbox"/>
	Rectifier Reading:				<input type="checkbox"/>

ANNUAL INSPECTION FORM

**LARD OIL COMPANY, INC.
DENHAM SPRINGS FACILITY
DENHAM SPRINGS, LOUISIANA**

TANK ID: _____

Date of Inspection	Inspection Item	Observation	Corrective Actions and Dates Performed	Inspector / Signature	Records Maintained Separately*
Vents					
	Are vents free of obstructions?				<input type="checkbox"/>
	Does the emergency vent operate properly? Lift as required?				<input type="checkbox"/>
	Do vents show signs of corrosion?				<input type="checkbox"/>
Level and Overfill Protection					
	Has the tank liquid level sensing device been tested to ensure proper operation?				<input type="checkbox"/>
	Does the tank liquid level sensing device operate as required?				<input type="checkbox"/>
	Are overfill prevention devices in proper working condition?				<input type="checkbox"/>
Electrical Equipment					
	Are tank ground lines in good condition?				<input type="checkbox"/>
	Grounding Resistance Reading:				<input type="checkbox"/>

**LARD OIL COMPANY, INC.
DENHAM SPRINGS FACILITY
DENHAM SPRINGS, LOUISIANA**

Date of Inspection	Inspection Item	Observation	Corrective Actions and Dates Performed	Inspector / Signature	Records Maintained Separately*
	Is electrical wiring for control boxes/lights in good condition?				<input type="checkbox"/>
Safety Equipment					
	Are signs in good shape?				<input type="checkbox"/>
	Has the fire extinguishers been maintained properly/				<input type="checkbox"/>
	Does the remote shutdown operate properly?				<input type="checkbox"/>

Additional Inspection Notes:

--

SECONDARY CONTAINMENT DRAINAGE FORM

**LARD OIL COMPANY, INC.
DENHAM SPRINGS FACILITY
DENHAM SPRINGS, LOUISIANA**

[illegible]

APPENDIX F – SUBSTANTIAL HARM CRITERIA CHECKLIST

CERTIFICATION OF SUBSTANTIAL HARM DETERMINATION
40 CFR 112.20(e), 40 CFR 112.20(f)(1)

FACILITY NAME: **Lard Oil Company, Inc. – Denham Springs Facility**

1. Does the facility transfer oil over water to or from vessels?
Yes _____ No X
2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?
Yes _____ No X
3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the formula in Attachment C-III, Appendix C, 40 CFR 112 or a comparable formula¹) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?
Yes _____ No X
4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula (Attachment C-III, Appendix C, 40 CFR 112 or a comparable formula¹) such that a discharge from the facility would shut down a public drinking water intake²?
Yes _____ No X
5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?
Yes _____ No X

Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Name (Print): Fred Guedry
Title: Environmental and Safety Coordinator
Signature: _____
Date: _____

¹If a comparable formula is used, documentation of the reliability and analytical soundness of the comparable formula must be attached to this form.

²For the purposes of 40 CFR part 112, public drinking water intakes are analogous to public water systems as described at 40 CFR 143.2(c).

APPENDIX G – SECONDARY CONTAINMENT CALCULATIONS

SPCC CONTAINMENT CALCULATIONS

Lard Oil Company, Inc.

Denham Springs Facility

Denham Springs, Louisiana

SECONDARY CONTAINMENT AREA NO. 1

Last Revised: 8/8/2012

Secondary Containment Dimensions

* Inside Dimensions

Type:	Concrete Wall	<-- User Input
Total Surface Area:	1,911	ft ²
Avg. Dike Height:	3.000	ft
Total Capacity:	42,886	gal

User Input Field
Calculated Field

Inside Dimensions:

	Length (ft)	Width (ft)	Area (ft ²)
Concrete Wall:	49.0000	39.0000	1911
Section 2:	0	0	0
Section 3:	0	0	0
	49.0000	39.0000	1911

Tank Displacement:

horizontal tanks:	V =	$L \left[R^2 \cos^{-1} \left(\frac{R-h}{R} \right) - (R-h) \sqrt{2Rh - h^2} \right]$
vertical tanks:	V =	$(\pi D^2/4)(h)$
Totes:	V =	L*W*h
Drums:	V =	$(\pi D^2/4)(h)$

			Diameter or Width	Height of Tank Off Ground	Height ²	Length	Displacement Volume
Tank No.	Type	Capacity ¹ (gal)	(ft)	(ft)	(ft)	(ft)	(gal)
1	V	4,000	7	0	3.000	-	863.7
2	V	20,000	10.7	0	3.000	-	2,018.0
3	V	20,000	10.7	0	3.000	-	2,018.0
4	V	10,000	10.7	0	3.000	-	2,018.0
5	V	10,000	10.7	0	3.000	-	2,018.0
6	V	10,000	10.7	0	3.000	-	2,018.0
Total Volume:		74,000	Volume of Single Largest Container:				(2,018.0)
Total Displacement Volume							8,935.45

1. For DRUMS, enter the total gallons of drums stored inside the containment area (i.e., 6 drums - 330 gal.). The Displacement volume assumes that each drum is standing on end and not laying down on side.

2. The height indicated in the table is the height of liquid in the tank in reference to the height of the secondary containment wall.

Available Secondary Containment

Available Secondary Containment = Total Capacity of Containment - Total Displacement Volume

Total Capacity of Containment

Total Displacement Volume

Net Volume Available

42,886	gal
8,935	gal
33,950	gal

Available Freeboard from Secondary Containment

Available Freeboard Percent = Net Volume Available/Volume of Largest Tank

Volume of Single Largest Container + 10%

Available Freeboard Volume

Available Freeboard Percent

22,000	gal
11,950	gal
154%	

Is the current secondary containment sufficient for EPA requirement?

YES

SPCC CONTAINMENT CALCULATIONS

Lard Oil Company, Inc.

Denham Springs Facility

Denham Springs, Louisiana

SECONDARY CONTAINMENT AREA NO. 2

Last Revised: 8/8/2012

Secondary Containment Dimensions

* Inside Dimensions

Type:	Concrete Wall	<-- User Input
Total Surface Area:	3,982	ft ²
Avg. Dike Height:	1.125	ft
Total Capacity:	33,507	gal

User Input Field
Calculated Field

Tank Displacement:

horizontal tanks:	V =	$L \left[R^2 \cos^{-1} \left(\frac{R-h}{R} \right) - (R-h) \sqrt{2Rh - h^2} \right]$
vertical tanks:	V =	$(\pi D^2/4)(h)$
Totes:	V =	L*W*h
Drums:	V =	$(\pi D^2/4)(h)$

Tank No.	Type	Capacity ¹ (gal)	Diameter or Width (ft)	Height of Tank Off Ground (ft)	Height ² (ft)	Length (ft)	Displacement Volume (gal)
1	V	3,000	7	0	1.125	-	323.9
2	V	3,000	7	0	1.125	-	323.9
3	V	3,000	7	0	1.125	-	323.9
4	V	3,000	7	0	1.125	-	323.9
5	V	3,000	7	0	1.125	-	323.9
6	V	3,000	7	0	1.125	-	323.9
7	V	3,000	7	0	1.125	-	323.9
8	V	3,000	7	0	1.125	-	323.9
9	V	3,000	7	0	1.125	-	323.9
10	V	6,500	8	0	1.125	-	423.0
11	V	8,000	8	0	1.125	-	423.0
12	V	6,500	8	0	1.125	-	423.0
13	V	6,500	8	0	1.125	-	423.0
14	V	6,500	8	0	1.125	-	423.0
15	V	6,500	8	0	1.125	-	423.0
16	V	6,500	8	0	1.125	-	423.0
17	V	6,500	8	0	1.125	-	423.0
18	V	6,500	8	0	1.125	-	423.0
19	V	6,500	8	0	1.125	-	423.0
20	V	6,500	8	0	1.125	-	423.0
21	V	6,500	8	0	1.125	-	423.0
22	V	6,500	8	0	1.125	-	423.0
23	V	6,500	8	0	1.125	-	423.0
24	V	6,500	8	0	1.125	-	423.0
25	V	6,500	8	0	1.125	-	423.0
26	V	6,500	8	0	1.125	-	423.0
27	V	6,500	8	0	1.125	-	423.0
28	V	6,500	8	0	1.125	-	423.0
29	V	6,500	8	0	1.125	-	423.0

SPCC CONTAINMENT CALCULATIONS

Lard Oil Company, Inc.

Denham Springs Facility

Denham Springs, Louisiana

SECONDARY CONTAINMENT AREA NO. 2

Last Revised: 8/8/2012

Secondary Containment Dimensions

* Inside Dimensions

User Input Field
Calculated Field

Type:	Concrete Wall	<-- User Input
Total Surface Area:	3,982	ft ²
Avg. Dike Height:	1.125	ft
Total Capacity:	33,507	gal

Tank Displacement:

horizontal tanks:	V =	$L \left[R^2 \cos^{-1} \left(\frac{R-h}{R} \right) - (R-h) \sqrt{2Rh - h^2} \right]$
vertical tanks:	V =	$(\pi D^2/4)(h)$
Totes:	V =	L*W*h
Drums:	V =	$(\pi D^2/4)(h)$

Tank No.	Type	Capacity ¹ (gal)	Diameter or Width	Height of Tank Off Ground	Height ²	Length	Displacement Volume
			(ft)	(ft)	(ft)	(ft)	(gal)
Waste Oil AST	H	1,000	6	2	1.000	14	324.4
Total Volume:		87,000	Displacement Volume of Single Largest Container:				(423.0)
Total Displacement Volume							11,276.47

1. For DRUMS, enter the total gallons of drums stored inside the containment area (i.e., 6 drums - 330 gal.). The Displacement volume assumes that each drum is standing on end and not laying down on side.

2. The height indicated in the table is the height of liquid in the tank in reference to the height of the secondary containment wall.

Available Secondary Containment

Available Secondary Containment = Total Capacity of Containment - Total Displacement Volume

Total Capacity of Containment	33,507	gal
Total Displacement Volume	11,276	gal
Net Volume Available	22,231	gal

Available Freeboard from Secondary Containment

Available Freeboard Percent = Net Volume Available/Volume of Largest Tank

Volume of Single Largest Container +10%	8,800	gal
Available Freeboard Volume	13,431	gal
Available Freeboard Percent	253%	

Is the current secondary containment sufficient for EPA requirement?

YES

SPCC CONTAINMENT CALCULATIONS

Lard Oil Company, Inc. Denham Springs Facility Denham Springs, Louisiana BOBTAIL LOADING RACK AREA

Secondary Containment Dimensions

Total Area	1942.685	ft ²
Height	4.00	in
Total Capacity	4,844	gal

User Input Field
Calculated Field

Containment

Inside Dimensions:

Length (ft)	Width (ft)
50	35

Tank Displacement

$$\begin{aligned} \text{horizontal tanks: } V &= L \left[R^2 \cos^{-1} \left(\frac{R-h}{R} \right) - (R-h) \sqrt{2Rh - h^2} \right] \\ \text{vertical tanks: } V &= (\pi D^2/4)(h) \end{aligned}$$

Tank No.	Type	Capacity ¹	Diameter (ft)	Height (ft)	Length (ft)	Volume (gal)
Truck	Transport	1,500				
Displacement Volume of Single Largest Container						-
Total Displacement Volume						0.00

1. The capacity provided in the table indicates the maximum capacity of the single largest compartment of that type of vehicle at any time.
2. Each vehicle could be parked at and/or working out of any one of 7 Delta Fuel locations. These location changes will not be considered as requiring a formal amendment to this SPCC Plan. They are always empty when parked on a site.

Available Secondary Containment

Available Secondary Containment = Total Capacity of Containment - Total Displacement Volume

Total Capacity of Containment	4,844.10	gal
Total Displacement Volume	0.00	gal
Net Volume Available	4,844.10	gal

Available Freeboard from Secondary Containment

Available Freeboard Percent = Net Volume Available/Volume of Largest Tank

Volume of Single Largest Container + 10%	1,650	gal
Available Freeboard Volume	3,194	gal
Available Freeboard Percent	294%	

Is the current secondary containment sufficient for EPA requirements?

YES

**APPENDIX H – WRITTEN COMMITMENT OF MANPOWER, EQUIPMENT, AND
MATERIALS**

WRITTEN COMMITMENT OF MAN-POWER, EQUIPMENT, AND MATERIALS

In addition to implementing the preventive measures described in this Plan, the Denham Springs Facility will also specifically:

- In the event of a discharge:
 - Make available all trained field personnel to perform response actions.
 - Obtain assistance from additional full-time employees from its main operations contractor.
 - Collaborate fully with local, state, and federal authorities on response and cleanup operations.
- Maintain all on-site oil spill control equipment described in this Plan.
- Maintain all communications equipment in operating condition at all times.
- Ensure that staging areas to be used in the event of a discharge to waters of the state are accessible by field vehicles.
- Review the adequacy of on-site and third-party response capacity with pre-established response/cleanup contractors on an annual basis and update response/cleanup contractor list as necessary.
- Maintain formal agreements/contracts with response and cleanup contractors who will provide assistance in responding to an oil discharge and/or completing cleanup (see **Appendix I, Emergency Response Contractor Agreement**).

Authorized Facility Representative: Fred Guedry

Signature: _____

Title: Environmental and Safety Coordinator

APPENDIX I – EMERGENCY RESPONSE CONTRACTOR AGREEMENT